

EXHIBIT 116

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 - - -

4 JOHN P. "JACK" FLYNN : NO.: 1:21-cv-02587-GHW/SLC
5 and LESLIE A. FLYNN, :
6 :

7 Plaintiffs,:

8 :

9 v. :

10 :

11 CABLE NEWS NETWORK, :
12 INC., :

13 :

14 Defendant. :
15

16 - - -

17 June 23, 2023

18 - - -

19 Videotaped deposition of DR.
20 SOPHIA MOSKALENKO, taken pursuant
21 to Notice, held at Veritext, 1801
22 Market Street, 18th Floor,
23 Philadelphia, Pennsylvania 19102,
24 beginning at approximately 10:04
a.m., before Mary Hammond, a
Registered Professional Reporter
and Notary Public in the state of
Pennsylvania.

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A-P-P-E-A-R-A-N-C-E-S

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Present via Zoom: Lindsey Cherner

Meenakshi Krishnan

Matt Riesdorph, Concierge

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WITNESS:

DR. SOPHIA MOSKALENKO

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(By agreement of counsel, the

reading, signing, sealing,

certification and filing are

waived, and all objections as to

the form of the question, are

reserved until the time of trial.)

- - -

THE VIDEOGRAPHER: Good

morning. We are here today,

June 23rd, 2023, for the videotaped

deposition of Dr. Sophia

Moskalenko.

Please note that microphones

are sensitive and may pick up

whispering and private

conversations.

Please mute your phones at

this time. Audio and video

recordings will continue to take

place, unless all parties agree to

go off the record.

<p style="text-align: right;">Page 6</p> <p>1 This is Media Unit 1 of the 2 video-recorded deposition of 3 Dr. Sophia Moskalenko, taken for 4 John also known as "Jack" Flynn 5 versus Cable News Network 6 Incorporated. 7 The location of the deposition 8 is 1801 Market Street, in 9 Philadelphia, Pennsylvania, at the 10 Veritext offices. 11 My name is Steve Cinaglia, and 12 I represent Veritext and I'm the 13 videographer. 14 The court reporter is 15 Mary Hammond, also from the firm 16 Veritext. 17 I am not authorized to 18 administer an oath. I am not 19 related to any party in this 20 action, nor am I financially 21 interested in the outcome. 22 If there are any objections to 23 the proceedings, please state them 24 at the time of your appearance.</p>	<p style="text-align: right;">Page 8</p> <p>1 BY MS. BOLGER: 2 Q. So good morning, Dr. Moskalenko. 3 As I said, my name is Kate Bolger. 4 And, as I mentioned before we went on the 5 record, I do tend to talk quickly, so please 6 let me know if you need me to slow down. 7 Have you ever been deposed before? 8 A. No. 9 Q. Okay. I'm just going to give you 10 some ground rules, so you understand how it 11 works. So I ask questions, you give me 12 answers. The -- Mary is here to take down 13 what we say, so we want to be careful to 14 answer each other orally, not nod or shake 15 heads, just talk to each other, and try to 16 not -- to not jump over each other. 17 Mr. Biss may from time to time 18 object to the form of my question. You may 19 answer it anyway. 20 If Mr. Biss tells you can't answer 21 it, then you can make a choice, but an 22 objection just means he doesn't like the form 23 of my question, rather than you can't answer 24 it.</p>
<p style="text-align: right;">Page 7</p> <p>1 Remote counsel will be stated 2 stenographically. 3 In-person counsel will now 4 state their appearances and 5 affiliations for the record, 6 beginning with the noticing 7 attorney. 8 MS. BOLGER: Kate Bolger from 9 Davis, Wright, Tremaine on behalf 10 of CNN, and on the line is 11 Lindsey Cherner, my colleague. 12 MR. BISS: Steve Biss for the 13 Plaintiffs. 14 THE VIDEOGRAPHER: Will the 15 court reporter now please swear in 16 the witness. 17 - - - 18 SOPHIA MOSKALENKO, Ph.D., 19 after having been first duly sworn, 20 was examined and testified as 21 follows: 22 - - - 23 DIRECT EXAMINATION 24 - - -</p>	<p style="text-align: right;">Page 9</p> <p>1 Did all of that make sense to you 2 today? 3 A. Yes. 4 Q. Okay. What did you do to prepare 5 for this deposition? 6 A. I re-read my expert opinion 7 reports, both of them. I read 8 Mr. Rothschild's expert opinion. I spoke 9 with Mr. Biss. And that's it. 10 Q. Okay. About how long did you speak 11 with Mr. Biss? 12 A. About an hour. 13 Q. And when was that? 14 A. Yesterday. I think, yesterday. 15 Q. What is time, really? In the world 16 post COVID, I never remember what day it is. 17 And did you talk to anybody else 18 about it? 19 A. No. 20 Q. Okay. Did you review any documents 21 in preparation for today? 22 A. I already answered which documents 23 I reviewed in preparation for today. 24 Q. Okay. No other -- no other</p>

<p style="text-align: right;">Page 10</p> <p>1 documents other than the reports?</p> <p>2 A. That's right.</p> <p>3 Q. Okay. Now, you're here today</p> <p>4 because you are here to give expert testimony</p> <p>5 at the request of the Flynnns, right?</p> <p>6 A. Right.</p> <p>7 Q. Okay. And this is your expert</p> <p>8 report, right?</p> <p>9 - - -</p> <p>10 (Whereupon, Exhibit-412,</p> <p>11 Expert Report, Tab 00, was marked</p> <p>12 for identification.)</p> <p>13 - - -</p> <p>14 MS. BOLGER: I'm going to hand</p> <p>15 the witness Exhibit-412.</p> <p>16 MS. CHERNER: This is Tab 00.</p> <p>17 Sorry.</p> <p>18 THE COURT REPORTER: I'm</p> <p>19 sorry, who was it?</p> <p>20 MS. BOLGER: That was Lindsey.</p> <p>21 THE COURT REPORTER: Thank</p> <p>22 you.</p> <p>23 BY MS. BOLGER:</p> <p>24 Q. And this is your expert report,</p>	<p style="text-align: right;">Page 12</p> <p>1 that they're adherents of the QAnon belief</p> <p>2 system?</p> <p>3 A. I read the ruling of the Court on</p> <p>4 that matter, which was part of the materials</p> <p>5 that Mr. Biss gave me to familiarize myself</p> <p>6 in order to prepare the expert witness</p> <p>7 report.</p> <p>8 Q. Okay. And, so, your -- your</p> <p>9 testimony was limited solely to the</p> <p>10 definition you thought the Court gave of the</p> <p>11 being a QAnon follower?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Do you know what this</p> <p>14 lawsuit is about?</p> <p>15 A. I believe I do.</p> <p>16 Q. And what's that?</p> <p>17 A. That CNN misrepresented the</p> <p>18 plaintiffs as QAnon followers in their</p> <p>19 reporting.</p> <p>20 Q. Have you seen their report?</p> <p>21 A. Yes.</p> <p>22 Q. Can you tell me what happens in</p> <p>23 their report?</p> <p>24 A. The report is about going in the</p>
<p style="text-align: right;">Page 11</p> <p>1 right?</p> <p>2 A. That's right.</p> <p>3 Q. Okay. And you -- you prepared</p> <p>4 this?</p> <p>5 A. I did.</p> <p>6 Q. Right.</p> <p>7 Yourself?</p> <p>8 A. Myself.</p> <p>9 Q. With no help?</p> <p>10 A. With no help.</p> <p>11 Q. Great. Okay.</p> <p>12 What were you asked to give an</p> <p>13 expert opinion on?</p> <p>14 A. I was asked to give an expert</p> <p>15 opinion on whether or not Jack and Leslie</p> <p>16 Flynn were QAnon followers in the sense of</p> <p>17 adhering to the system of beliefs represented</p> <p>18 by QAnon, and whether an attribution can be</p> <p>19 made about the intentions behind their</p> <p>20 utterance of a phrase, "Where We Go One, We</p> <p>21 Go All" at their back's -- backyard barbecue.</p> <p>22 Q. Okay. Did Mr. Biss tell you that</p> <p>23 the question of QAnon -- QAnon followers in</p> <p>24 this case is limited in some way to saying</p>	<p style="text-align: right;">Page 13</p> <p>1 midst of QAnon-follower gatherings, that</p> <p>2 includes several such gatherings.</p> <p>3 And at one point, there is a video</p> <p>4 of the Flynn family at their, you know,</p> <p>5 barbecue reciting the oath to the</p> <p>6 Constitution, then it follows with, "Where We</p> <p>7 Go One, We Go All."</p> <p>8 And there is a chyron on the bottom</p> <p>9 that says "QAnon Followers," which is the</p> <p>10 reason for their lawsuit.</p> <p>11 Q. Okay. You said that the -- the</p> <p>12 report is about several gatherings.</p> <p>13 What gatherings do you think it was</p> <p>14 about?</p> <p>15 A. I don't remember other instances.</p> <p>16 I remember that it was not just about the</p> <p>17 Flynnns' barbecue. There were other things</p> <p>18 reported on in that segment.</p> <p>19 Q. When you looked at the report, did</p> <p>20 you make a decision about the meaning of the</p> <p>21 report?</p> <p>22 A. No.</p> <p>23 Q. Okay. You're not here to opine on</p> <p>24 what the report means, right?</p>

<p style="text-align: right;">Page 14</p> <p>1 A. That's right.</p> <p>2 Q. And you're not here to opine on the</p> <p>3 truth of the report, right?</p> <p>4 MR. BISS: Object to the form.</p> <p>5 THE WITNESS: If -- I need to</p> <p>6 answer more than just "yes" or "no"</p> <p>7 to this.</p> <p>8 BY MS. BOLGER:</p> <p>9 Q. That's fine.</p> <p>10 A. I'm here to opine on a small part</p> <p>11 of the report, and whether there is evidence</p> <p>12 to suggest that it's truthful or not, and</p> <p>13 that small part is the label of people at the</p> <p>14 barbecue as QAnon followers.</p> <p>15 Q. Are you trying to offer an opinion</p> <p>16 as to truth as to what you construe that</p> <p>17 meaning to be?</p> <p>18 MR. BISS: Object to form.</p> <p>19 BY MS. BOLGER:</p> <p>20 Q. Are you trying to say it's true or</p> <p>21 false today, is that your opinion?</p> <p>22 A. I can only offer my expert opinion</p> <p>23 on the evidence in the case to the fact or</p> <p>24 lack thereof of Jack and Leslie Flynn being</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. Okay. So one last time.</p> <p>2 So are you offering your opinion,</p> <p>3 then, that that label as it related to that</p> <p>4 moment in the video is also?</p> <p>5 MR. BISS: Asked and answered,</p> <p>6 twice.</p> <p>7 BY MS. BOLGER:</p> <p>8 Q. You can answer it.</p> <p>9 A. I think I answered it.</p> <p>10 Q. You can answer it again. I</p> <p>11 don't -- I don't think you did.</p> <p>12 MR. BISS: Can --</p> <p>13 BY MS. BOLGER:</p> <p>14 Q. So this time it's "yes" or "no."</p> <p>15 You've told me you want to talk about a small</p> <p>16 portion of the report, you want to talk about</p> <p>17 what the Court said as to this label.</p> <p>18 And I'm asking you: Did you</p> <p>19 conclude based on those two factors, which</p> <p>20 were your limits, it's false?</p> <p>21 MR. BISS: Asked and answered.</p> <p>22 This is the last time we're</p> <p>23 going to answer it, Kate.</p> <p>24 MS. BOLGER: She's an expert,</p>
<p style="text-align: right;">Page 15</p> <p>1 adherence to QAnon belief system, and,</p> <p>2 therefore, being accurately labeled as QAnon</p> <p>3 followers.</p> <p>4 Q. You'll agree with me the report</p> <p>5 doesn't say that they're adherent to a QAnon</p> <p>6 belief system, right?</p> <p>7 A. I agree with you.</p> <p>8 Q. Okay. You are also aware that this</p> <p>9 is a defamation case and falsity and truth</p> <p>10 are very important, right?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Are you here, then, to offer</p> <p>13 an opinion that the report is false?</p> <p>14 MR. BISS: Asked and answered.</p> <p>15 BY MS. BOLGER:</p> <p>16 Q. You can answer it again.</p> <p>17 A. I already said that my opinion</p> <p>18 pertains to a very small part of the report,</p> <p>19 mainly, the labeling of the people in the</p> <p>20 video as QAnon followers, and whether or not</p> <p>21 that label corresponds with what the Court</p> <p>22 ruled to be a definition of QAnon follower.</p> <p>23 I can offer my expert opinion on whether or</p> <p>24 not that label was accurate.</p>	<p style="text-align: right;">Page 17</p> <p>1 Steve. I wouldn't do that here.</p> <p>2 BY MS. BOLGER:</p> <p>3 Q. Please answer.</p> <p>4 MR. BISS: We're -- we're --</p> <p>5 we're not going to do it again.</p> <p>6 I'm just telling you.</p> <p>7 BY MS. BOLGER:</p> <p>8 Q. You can answer.</p> <p>9 A. I can offer an opinion on whether</p> <p>10 that label was warranted, given the facts in</p> <p>11 the evidence submitted to me of beliefs or</p> <p>12 lack thereof in QAnon belief system of Jack</p> <p>13 and Leslie Flynn.</p> <p>14 Q. You said, based on evidence</p> <p>15 submitted to you?</p> <p>16 A. Based on evidence that I reviewed.</p> <p>17 Q. Okay. And that evidence was</p> <p>18 provided to you by Mr. Biss?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Are you in expressing an</p> <p>21 opinion on CNN's intent in publishing the</p> <p>22 report?</p> <p>23 A. 5I do not.</p> <p>24 Q. So do you agree with what you</p>

<p style="text-align: right;">Page 18</p> <p>1 perceive the Court -- how you perceive the 2 Court to have defined QAnon followers? 3 A. I do. 4 Q. Okay. So every time you've used 5 the word "QAnon followers" in your research, 6 you've meant it as someone who's adherent to 7 the QAnon belief system? 8 A. I believe so. Although to caveat, 9 I have been researching QAnon for four years, 10 four and a half years, and my understanding 11 of QAnon has evolved significantly since I 12 first started doing it, based on my 13 colleague's research, my own research, and 14 journalistic accounts. 15 And, so, it is very likely that 16 there is not a perfect continuity in how I 17 understood QAnon and how I reported on it. 18 Q. Is it your testimony that the 19 judge's formulation is somehow more perfect 20 than yours was? 21 A. It is my testimony. And, again, to 22 caveat, my understanding of QAnon has changed 23 with more data. And where I am now with my 24 understanding of QAnon is in agreement with</p>	<p style="text-align: right;">Page 20</p> <p>1 A. I don't remember. 2 Q. Okay. When you wrote an article 3 saying that, "QAnon was a mental health 4 crisis," and you referred to QAnon followers 5 in that piece, what did you mean QAnon 6 followers to be? 7 A. So that I can answer a little 8 better because in that piece I rely on 9 somebody else's data, in particular the data 10 of the National -- National Consortium for 11 the Study of Terrorism and Responses to 12 Terrorism, a database called PIRUS that's 13 maintained by Mike Jensen. 14 And PIRUS has a definition -- an 15 operational definition for what a QAnon 16 follower is. And I communicated with 17 Mike Jensen at that time to make sure that 18 his definition squares with my understanding. 19 And he defined QAnon followers as -- because 20 a PIRUS database is drawn from mostly 21 journalistic accounts. 22 So they use evidence from 23 journalistic accounts, such as CNN. When it 24 is supplemented with visual evidence, like</p>
<p style="text-align: right;">Page 19</p> <p>1 the judge's understanding of what a QAnon 2 follower is. 3 Q. And when did that happen? 4 A. I can't give you a date. It's -- 5 it's not an event that I marked on the 6 calendar. 7 Q. Well, when you wrote the book 8 "Pastels and Pedophiles," did you agree with 9 the judge's opinion? 10 A. I don't remember what I thought 11 then. I can tell you that the book came out 12 in, I believe, 2020, which was three years 13 ago, and my knowledge of QAnon and my 14 understanding have been continually informed 15 by new data and new research, my own and my 16 colleague's. 17 And, so, it is possible that at the 18 time of writing the book it was different 19 than it is now. 20 Q. Okay. And when you wrote the 21 article, "Why QAnon Followers are like Opioid 22 Addicts and Why That Matters," in 2021, what 23 was the definition of "follower" you used 24 then?</p>	<p style="text-align: right;">Page 21</p> <p>1 screenshots, and they work hard to obtain 2 other data to triangulate journalistic 3 accounts, such as affidavits submitted in 4 court cases where other people testified to 5 this person who might or might not be a QAnon 6 follower, expressing their beliefs, or this 7 person in question's own writing on their 8 website and their blog in their, you know, 9 video recordings. 10 So it's never just journalistic 11 accounts, from what you told me. It's always 12 triangulated, and that was comforting to me 13 and I felt that was a good way of 14 categorizing QAnon followers. 15 Q. So what's his definition? 16 A. It's somebody who expressing 17 beliefs in QAnon conspiracy theories, and, 18 also, somehow displays their membership in 19 their clothing and insignia, in their tweets, 20 in their online footprint. 21 Q. And where is that written down? 22 A. It's in an email that Mike sent to 23 me. 24 Q. Okay. Do you still have that</p>

<p style="text-align: right;">Page 22</p> <p>1 email?</p> <p>2 A. I'm not sure.</p> <p>3 Q. Okay.</p> <p>4 MS. BOLGER: Well, I will call</p> <p>5 for the production of that email.</p> <p>6 BY MS. BOLGER:</p> <p>7 Q. So, in 2020, what was your</p> <p>8 understanding of the QAnon follower?</p> <p>9 A. I know that in 2020, I believe that</p> <p>10 adherence to the belief system, namely, the</p> <p>11 conspiracy theories associated with QAnon was</p> <p>12 a necessary part of being a QAnon follower.</p> <p>13 As to other components, I don't</p> <p>14 remember.</p> <p>15 Q. How about in 2021, what was your</p> <p>16 understanding of the QAnon -- being a QAnon</p> <p>17 follower?</p> <p>18 A. I can't answer that. I -- I didn't</p> <p>19 track the evolution of my understanding</p> <p>20 through time.</p> <p>21 Q. Okay. In March of 2020- -- I'm</p> <p>22 sorry, February 5, 2021, if you saw the word</p> <p>23 "QAnon followers," what was your</p> <p>24 understanding of it?</p>	<p style="text-align: right;">Page 24</p> <p>1 movements.</p> <p>2 Q. I don't have any other scholars</p> <p>3 with me. I only have you.</p> <p>4 When you say it's a belief system,</p> <p>5 did you mean it's a religion?</p> <p>6 A. I did not mean that.</p> <p>7 Q. Okay. What is a belief-based</p> <p>8 system if it's not a religion?</p> <p>9 A. It can be many different things.</p> <p>10 For example, you know, some people in</p> <p>11 feminist principles, that's a belief-based</p> <p>12 system, and they, you know, sometimes have</p> <p>13 more radical beliefs, or less radical</p> <p>14 beliefs, but they center around those.</p> <p>15 Q. When you -- after Mr. Biss hired</p> <p>16 you and gave you the specific definition of</p> <p>17 "QAnon," what documents did you look at to</p> <p>18 put together the report?</p> <p>19 A. They are listed in my report, I</p> <p>20 believe, and...</p> <p>21 Q. If you can find them, I'd be have</p> <p>22 happy to see that.</p> <p>23 A. Okay. It's on Page 7.</p> <p>24 Q. Mm-humm.</p>
<p style="text-align: right;">Page 23</p> <p>1 A. I know that I would have understood</p> <p>2 it as somebody believing in QAnon conspiracy</p> <p>3 theories. As to other elements, I cannot</p> <p>4 answer that because I don't remember.</p> <p>5 Q. What is your basis for the fact</p> <p>6 that you know that that would have been</p> <p>7 someone who believed in conspiracy theories?</p> <p>8 A. Because that was the guiding</p> <p>9 principle of learning about QAnon from the</p> <p>10 time that I started studying it because QAnon</p> <p>11 appeared to be -- and it still appears this</p> <p>12 way -- a belief-based radical movement.</p> <p>13 Q. Do you mean belief-based as in</p> <p>14 religion, or do you mean something different</p> <p>15 than belief-based?</p> <p>16 A. I don't understand the question.</p> <p>17 Can you please rephrase?</p> <p>18 Q. Sure.</p> <p>19 Do you mean its religion?</p> <p>20 A. I don't know the answer to that</p> <p>21 question. There are some scholars who make</p> <p>22 the case for it being a religion. And at the</p> <p>23 same time, I don't think that religions are</p> <p>24 the only belief-based systems of community or</p>	<p style="text-align: right;">Page 25</p> <p>1 A. It says, "Facts and Data</p> <p>2 Considered."</p> <p>3 And the paragraph says, "In</p> <p>4 offering the opinions in this report, I</p> <p>5 reviewed A, the CNN Report."</p> <p>6 "B-" --</p> <p>7 Q. Well, just take them one at a time.</p> <p>8 So, the CNN report, what CNN report</p> <p>9 do you mean?</p> <p>10 A. The video recording that contained</p> <p>11 the -- the segment with the labeling "QAnon</p> <p>12 followers."</p> <p>13 Q. Any other CNN recording?</p> <p>14 A. Maybe. There was something with</p> <p>15 Don Lemon? I -- I don't remember.</p> <p>16 Q. Okay. Now, it says, "The parties</p> <p>17 pleadings, including the Flynn's Amended</p> <p>18 Complaints."</p> <p>19 How many Complaints did you look</p> <p>20 at?</p> <p>21 A. I don't remember.</p> <p>22 Q. Okay. What other pleadings did you</p> <p>23 look at, other than the plaintiff's</p> <p>24 Complaint?</p>

<p style="text-align: right;">Page 26</p> <p>1 A. I think this is a good list of what 2 I looked at. I have looked at some other 3 things since filing this report; like, for 4 example, the motion to dismiss hearing before 5 the judge, but... 6 Q. Well, I will tell you that this 7 says things like, "The parties' pleadings 8 including the Flynn's Amended Complaint." 9 And I'm asking you: What other 10 pleadings did you look at? 11 A. I don't remember that I looked at 12 other pleadings. 13 Q. Well, it does say, "The parties' 14 pleadings, including." 15 Do you see that? 16 MR. BISS: What's the point? 17 MS. BOLGER: Right. 18 BY MS. BOLGER: 19 Q. So it implies that you saw a bunch 20 of things, including this one. That's what 21 I'm asking you. 22 A. It does not necessarily. 23 Q. Okay. So are you saying you didn't 24 look at anything else?</p>	<p style="text-align: right;">Page 28</p> <p>1 sorry, I didn't get any of that. 2 MS. BOLGER: Sorry. 3 BY MS. BOLGER: 4 Q. What exhibits introduced during the 5 during depositions of Donie O'Sullivan, 6 Jack Flynn, Leslie Flynn, Valerie Flynn, and 7 Lori Flynn, did you look at? 8 A. I looked at all the exhibits 9 connected with those depositions that 10 Mr. Flynn turned over to me. 11 Q. Did you read the deposition of 12 JT Wilde? 13 A. No. 14 Q. Did you read the deposition of 15 Donie O'Sullivan? 16 A. Yes. 17 Q. Did you read the whole deposition, 18 or just portions Mr. Biss gave you? 19 A. I read whatever Mr. Biss gave me. 20 Q. Right. That's my question. 21 Did he give you portions, or did he 22 give you page -- page numbers, or did you sit 23 down and read it from beginning to end? 24 A. I read from beginning to end,</p>
<p style="text-align: right;">Page 27</p> <p>1 A. I do not remember. That's what I'm 2 saying. 3 Q. Okay. Well, that -- that's fine, 4 too. 5 The District Court's memorandum 6 opinion order we talked about, the Flynn's 7 disclosures and doc- -- discovery responses. 8 What disclosures did you look at? 9 A. I think the disclosures included 10 some of their emails between them and some 11 private parties. 12 I -- I think it's a question of 13 fact that if I don't remember it, I don't 14 remember it, but it's easy enough to 15 ascertain because those are materials that 16 Mr. Biss submitted to me. 17 I'm not, you know, necessarily 18 going to remember everything that I looked 19 at, but I did look at the -- all the 20 materials submitted to me by Mr. Biss. 21 Q. Okay. Did you look -- what 22 portions of -- what exhibits introduced 23 during the deposition of Donie O'Sullivan? 24 THE COURT REPORTER: I'm</p>	<p style="text-align: right;">Page 29</p> <p>1 whatever he gave. I don't remember if there 2 were some portions that were omitted from 3 that. 4 Q. How about the deposition of 5 Leslie Flynn? 6 A. I read that from beginning to end. 7 Q. Okay. How about General Flynn? 8 A. I have not read that. 9 Q. Tracy Diaz? 10 A. I have not read that. 11 Q. Valerie Flynn? 12 A. I have read that. 13 Q. Lori Flynn? 14 A. Yes, I have. 15 Q. Mary Flynn? 16 A. No. 17 Q. Joe Flynn? 18 A. I don't think so, no. 19 Q. Jennifer Freitas? 20 A. No. 21 Q. Okay. Jack Flynn? 22 A. Yes. 23 Q. Okay. Emily Lacey-Bordeaux? 24 A. No.</p>

<p style="text-align: right;">Page 30</p> <p>1 Q. Wilson Powell?</p> <p>2 A. Yes.</p> <p>3 Q. Whole thing, or just portions?</p> <p>4 A. I don't know that there were parts</p> <p>5 omitted from it. I don't remember.</p> <p>6 Q. Okay. How about Jeffrey Pedersen?</p> <p>7 A. No.</p> <p>8 Q. And Fuzz Hogan?</p> <p>9 A. No.</p> <p>10 Q. Do you know who JT Wilde is?</p> <p>11 A. No.</p> <p>12 Q. Do you know who Jeffrey Pedersen?</p> <p>13 A. No.</p> <p>14 Q. Do you know who Tracy Diaz is?</p> <p>15 A. No.</p> <p>16 Q. Okay.</p> <p>17 MS. BOLGER: So I will call</p> <p>18 for the production of the material</p> <p>19 provided to you by Mr. Biss, which</p> <p>20 I'm entitled to, so, Steve, please</p> <p>21 make sure I get that.</p> <p>22 BY MS. BOLGER:</p> <p>23 Q. What methodology did you apply in</p> <p>24 reaching your conclusions?</p>	<p style="text-align: right;">Page 32</p> <p>1 attributions and attribution theories.</p> <p>2 And I think that's a fairly good</p> <p>3 list.</p> <p>4 Q. Okay. You're not a journalist,</p> <p>5 correct?</p> <p>6 A. Correct.</p> <p>7 Q. You do not purport to be an expert</p> <p>8 in journalism, correct?</p> <p>9 A. Correct.</p> <p>10 Q. And you are not a data scientist,</p> <p>11 correct?</p> <p>12 A. I'm a scientist who uses data.</p> <p>13 Q. But you are not an</p> <p>14 information-based system scientist, someone</p> <p>15 who invents the computer code that goes out</p> <p>16 and seeks information?</p> <p>17 A. That is correct.</p> <p>18 Q. Okay. By the way, since you've had</p> <p>19 this, you know, evolving definition of QAnon</p> <p>20 followers that just happens to coincide with</p> <p>21 the Court's, have you gone back and corrected</p> <p>22 any of your other articles or publications</p> <p>23 when you had a different understanding of</p> <p>24 QAnon followers?</p>
<p style="text-align: right;">Page 31</p> <p>1 A. I applied the methodology that I</p> <p>2 use in my work as a researcher, a</p> <p>3 psychologist, who researches beliefs in</p> <p>4 conspiracy theories;</p> <p>5 And that methodology includes</p> <p>6 understanding of surveys and questions that</p> <p>7 are used in order to elicit answers on</p> <p>8 beliefs;</p> <p>9 Understanding of interviews, and</p> <p>10 interview methods that are used in obtaining</p> <p>11 information about people's beliefs;</p> <p>12 Understanding of polling</p> <p>13 methodology, and case study methodology that</p> <p>14 I have myself used -- I've used all of these</p> <p>15 in my work.</p> <p>16 What else. My experience in</p> <p>17 reading QAnon-related Telegram channels and</p> <p>18 Tweets and Facebook posts and YouTube videos</p> <p>19 and my analysis of those;</p> <p>20 My general knowledge of social</p> <p>21 psychology and belief systems, as related to</p> <p>22 social psychology research;</p> <p>23 Knowledge of attributions,</p> <p>24 attribution theory, and intention</p>	<p style="text-align: right;">Page 33</p> <p>1 A. I don't know that there is anything</p> <p>2 to correct, so I have not, you know, gone</p> <p>3 back to correct anything because I don't know</p> <p>4 that there are any errors. I just don't</p> <p>5 remember exactly what I thought.</p> <p>6 However, as QAnon is a new</p> <p>7 phenomenon, our understanding of it is</p> <p>8 changing, and, so, my new work would be more</p> <p>9 in agreement with my new views on QAnon.</p> <p>10 Q. What work are you working on</p> <p>11 related to QAnon right now?</p> <p>12 A. Oh, a lot. I have a really large</p> <p>13 survey study, 500 people, who answered</p> <p>14 questions about their QAnon beliefs, as well</p> <p>15 as questions about their support for</p> <p>16 January 6th insurrection, and some questions</p> <p>17 about their personality composition and those</p> <p>18 data show interesting differences in gender</p> <p>19 and interrelations between QAnon beliefs and</p> <p>20 personality variables, and an interaction</p> <p>21 effect between gender, personality variables,</p> <p>22 QAnon beliefs and support for January 6th.</p> <p>23 So that's one work.</p> <p>24 Another one is -- I'm comparing</p>

<p style="text-align: right;">Page 34</p> <p>1 data for people who believe in QAnon 2 conspiracy theories, data on their radical 3 intentions with perceptions of QAnon 4 followers' radical intentions from people who 5 don't believe in QAnon conspiracy theories. 6 In other words, what are the real reported 7 radical intentions of QAnon followers versus 8 perceived. 9 And a third point of comparison is 10 radical intentions of people who don't 11 believe in QAnon followers. 12 So that's a really important data 13 point to triangulate with Mike Jensen's 14 database on radical action out of QAnon 15 activity. That's another project. 16 The third project is I'm comparing 17 beliefs in QAnon conspiracy theories with 18 support for authoritarian leaders and with 19 something called fragile masculinity, which 20 has been shown before to predict 21 radicalization when threatened. So that's a 22 third project. 23 Q. And how are you gathering that 24 information?</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. Okay. So what are your 2 conclusions? 3 A. On? 4 Q. In your report. 5 A. Based on the data that I reviewed, 6 the data that Mr. Flynn -- I'm sorry, 7 Mr. Biss turned over to me, I did not see 8 evidence that Jack or Leslie Flynn subscribed 9 to any QAnon conspiracy theories, not one. 10 I also didn't see evidence of them 11 expressing support in the sense of, you know, 12 positive feelings toward QAnon as a movement. 13 I also saw evidence of them 14 distancing themselves from QAnon in private 15 communications prior to the barbecue where 16 they filmed the reciting -- themselves 17 reciting the words, "Where We Go One, We Go 18 All." 19 And in their depositions, they made 20 it clear that they were not even familiar 21 with some of the basic tenants of QAnon, and 22 with what the phrase meant for QAnon. 23 Q. What phrase? 24 A. "Where We Go One, We Go All."</p>
<p style="text-align: right;">Page 35</p> <p>1 A. All of the -- the projects that I 2 described are based on surveys of large 3 samples drawn through Prolific. Prolific is 4 a platform that enables researchers to 5 collect data from people that Prolific pre 6 selects, and filtering them according to 7 criteria of the researchers. 8 So, for example, I can select 9 participants selected on gender, age, 10 geographic location, in hopes of matching my 11 sample to the composition of the US 12 population, so the sample would be 13 representative and the data from that sample 14 could be better generalized to what QAnon 15 believers look like, for example, in the US, 16 as opposed to just in the sample. 17 Q. And you did not conduct any surveys 18 as part of your work in the expert report in 19 this case, did you? 20 A. I did not. 21 Q. Right, because the surveys wouldn't 22 have told you about the individual thoughts 23 of a few people, correct? 24 A. Correct.</p>	<p style="text-align: right;">Page 37</p> <p>1 I also saw evidence of them, 2 especially Jack, expressing lack of knowledge 3 about QAnon in his direct tweeting. 4 So, based on those observations 5 from the data that I received from Mr. Biss, 6 my opinion was that Jack and Leslie Flynn at 7 the time of the recitation of the phrase, 8 "Where We Go One, We Go All," were not QAnon 9 followers. 10 Q. Okay. Any other conclusions that 11 you reached in your report, as opposed to 12 your rebuttal report? 13 A. I was asked to opine on the 14 intentions behind -- behind the recitation, 15 and intentions are harder to -- to gather 16 data on in the aftermath of the action than 17 beliefs, but beliefs offer important 18 information that helps to reach conclusions 19 about intentions. 20 And, so, based on my first 21 conclusion that Jack and Leslie Flynn were 22 not followers, my conclusion on the 23 intentions behind their recitation was that 24 it was not to pledge allegiance -- allegiance</p>

<p style="text-align: right;">Page 38</p> <p>1 to QAnon.</p> <p>2 Q. What was not?</p> <p>3 A. Reciting the phrase, "Where We Go</p> <p>4 One, We Go" -- "We Go All."</p> <p>5 Q. Did you look at any documents from</p> <p>6 CNN in reaching this conclusions -- from CNN</p> <p>7 itself, CNN Bates numbered documents?</p> <p>8 A. I don't think so.</p> <p>9 Q. So you reached conclusions about</p> <p>10 CNN's reporting but did not look at CNN's</p> <p>11 documents, right?</p> <p>12 A. I did not make conclusions about</p> <p>13 CNN reporting. My conclusions pertained to</p> <p>14 Jack and Leslie Flynn being or not being</p> <p>15 followers of QAnon. I did not make</p> <p>16 conclusions about CNN. I wasn't asked to</p> <p>17 make conclusions about CNN.</p> <p>18 Q. CNN's reporting.</p> <p>19 A. I didn't opine about CNN reporting.</p> <p>20 I opined about whether or not Jack and</p> <p>21 Leslie Flynn could be labeled QAnon</p> <p>22 followers, based on the evidence provided to</p> <p>23 me.</p> <p>24 Q. So you have no idea what documents</p>	<p style="text-align: right;">Page 40</p> <p>1 social media in putting together your report,</p> <p>2 right, your -- your report?</p> <p>3 A. I look at social media every day.</p> <p>4 Q. Okay. So if you look at Page 7 of</p> <p>5 your report, it says, "I have not reviewed"</p> <p>6 -- oh. "I am aware that Flynns have produced</p> <p>7 voluminous social media data files. I have</p> <p>8 not reviewed these files" --</p> <p>9 A. That is correct.</p> <p>10 Q. -- is that correct?</p> <p>11 So you did not look at any of the</p> <p>12 Flynns' social media files before you put</p> <p>13 together your report?</p> <p>14 A. Some of the documents produced to</p> <p>15 me by Mr. Biss contained records from --</p> <p>16 resurrected from Jack Flynn's Twitter account</p> <p>17 and Leslie Flynn's postings.</p> <p>18 In that sense, I have looked at</p> <p>19 their social media, but it was a limited</p> <p>20 look, and that's what that phrase in my</p> <p>21 report states, that I have not looked at all</p> <p>22 other things that they may have posted,</p> <p>23 which, you know, is a lot of things.</p> <p>24 Q. Okay?</p>
<p style="text-align: right;">Page 39</p> <p>1 CNN looked at before they published their</p> <p>2 report?</p> <p>3 A. I read in motion hearings that</p> <p>4 Mr. Biss argued that they -- that CNN did not</p> <p>5 actually contact Jack or Leslie Flynn for</p> <p>6 their comment, and that they did not go</p> <p>7 through any available online footprint of</p> <p>8 Jack and Leslie Flynn before publishing their</p> <p>9 report.</p> <p>10 Q. Mr. Biss said that?</p> <p>11 A. I believe it was in the -- in the</p> <p>12 motion hearing that I read.</p> <p>13 Q. Okay. But that's not a CNN</p> <p>14 document, right, Mr. Biss doesn't work for</p> <p>15 CNN?</p> <p>16 MR. BISS: He doesn't.</p> <p>17 THE WITNESS: Are you --</p> <p>18 BY MS. BOLGER:</p> <p>19 Q. I'm asking you: Did you see a CNN</p> <p>20 document --</p> <p>21 A. I said I don't think so.</p> <p>22 Q. -- about CNN's reporting?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And you didn't look at</p>	<p style="text-align: right;">Page 41</p> <p>1 MS. BOLGER: And I'm going to</p> <p>2 repeat my call for the production</p> <p>3 of all of the documents that</p> <p>4 Dr. Moskalenko has seen.</p> <p>5 MR. BISS: Why do you need to</p> <p>6 repeat it?</p> <p>7 MS. BOLGER: Because I think</p> <p>8 it's outrageous that I didn't get</p> <p>9 them beforehand.</p> <p>10 MR. BISS: Well, you didn't</p> <p>11 give me yours.</p> <p>12 MS. BOLGER: You haven't asked</p> <p>13 me for yours -- for mine.</p> <p>14 MR. BISS: It doesn't matter.</p> <p>15 MS. BOLGER: Yes, it does.</p> <p>16 MR. BISS: You should have</p> <p>17 done it anyway.</p> <p>18 BY MS. BOLGER:</p> <p>19 Q. Other than the conclusions you</p> <p>20 talked about, about the Flynns' belief and</p> <p>21 intention, did you reach any other</p> <p>22 conclusions in your report?</p> <p>23 A. It seems like a trick question.</p> <p>24 May I look back on my report?</p>

<p style="text-align: right;">Page 42</p> <p>1 Q. It's definitely not a trick 2 question. It's an open-ended question. You 3 may certainly look back at your report. 4 A. Okay. So the second part -- on 5 Page 12 of my report, there is a section 6 titled, "Was the Backyard Recitation an Oath 7 to QAnon?" 8 I guess you can file it generally 9 under the question of intention that I spoke 10 to earlier, but, if you wish, you can file it 11 separately as an opinion that I reached. 12 Q. The phrase "Backyard Barbecue," did 13 Mr. Biss use that phr- -- that phrase in 14 talking to you? 15 A. I don't think so. I don't think 16 so. 17 Q. Okay. Can I ask you a question 18 about Page 12? 19 A. Yes. 20 Q. So the -- the -- the final full 21 paragraph on Page 12 reads, "In the absence 22 of evidence of the Flynn's belief in QAnon 23 conspiracy theories, the only parsimonious 24 interpretation of the intentions behind their</p>	<p style="text-align: right;">Page 44</p> <p>1 right, or the most miserly. It means the -- 2 the most constrained conservative view, 3 correct? 4 A. I don't think you're disagreeing 5 with me, but I'll -- I'll accept that 6 definition, yes. 7 Q. Okay. Which is different than a 8 reasonable opinion, right? 9 A. Let me think about that for a 10 second. 11 I don't think so. Can you explain, 12 please, what you mean by that? How is it 13 different than -- 14 Q. So -- so parsimonious 15 interpretations are necessarily limited, 16 correct? It's Occam's razor, right? 17 A. Yes, yes. Right. Absolutely. 18 Q. Parsimonious opinions are 19 necessarily limited? 20 A. Yes, absolutely. 21 Q. Reasonable opinions don't have the 22 supervisor of Occam's razor pars- -- limit, 23 right? 24 A. They do to me.</p>
<p style="text-align: right;">Page 43</p> <p>1 utterance is their desire to express 2 patriotism and family unity." 3 Do you see that? 4 A. Yes, I do. 5 Q. Why were you offering a 6 parsimonious interpretation? 7 A. Because I didn't have a chance to 8 interview Jack and Leslie Flynn. I didn't 9 know them personally. I didn't have all the 10 information available in the universe to 11 support or not support my opinion. 12 And, so, I cannot offer a fully 13 100-percent informed opinion. Parsimonious 14 opinion is the only one available to me, 15 based on availability of information to make 16 it. 17 Q. Okay. And just because I -- I want 18 to make sure the record is totally clear, 19 when you use the word "parsimonious," what do 20 you specifically mean by the word 21 "parsimonious"? 22 A. The one the fits the best. 23 Q. But that's not what "parsimonious" 24 means. "Parsimonious" means the simplest,</p>	<p style="text-align: right;">Page 45</p> <p>1 Q. Okay. You think a reasonable 2 person who looks at a situation makes 3 parsimonious interpretations? 4 A. To the best of their abilities, I 5 do. I do. 6 Q. You think that "reasonableness" and 7 "parsimony" are the same? 8 A. I think one is a fancier and more 9 structured way to describe what the other one 10 is. 11 Q. I don't need to fight with you, 12 Dr. Moskalenko, but "parsimonious" implies an 13 absence of information. 14 MR. BISS: It sounds like a 15 fighting word. 16 BY MS. BOLGER: 17 Q. Reasonableness does not, right? 18 A. You base your reason on something, 19 and in the absence of complete information, 20 you must base it on limited information and 21 in that sense "reasonableness" is very much 22 like "parsimony." 23 Q. Only when the information is 24 limited?</p>

<p style="text-align: right;">Page 46</p> <p>1 A. Correct.</p> <p>2 Q. Okay. Do you know who</p> <p>3 Donie O'Sullivan is?</p> <p>4 A. Yes.</p> <p>5 Q. Who is Donie O'Sullivan?</p> <p>6 A. He is a journalist who wrote to the</p> <p>7 journalistic body of knowledge on QAnon and</p> <p>8 spoke to it and appeared on CNN, I believe,</p> <p>9 yeah.</p> <p>10 Q. Okay. Have you ever spoken to him?</p> <p>11 A. No.</p> <p>12 Q. Do you have an opinion of his work?</p> <p>13 A. I respect his work.</p> <p>14 Q. And do you know what documents he</p> <p>15 saw in putting -- I think you said you</p> <p>16 don't -- in putting the report? I'm sorry if</p> <p>17 I asked you that already.</p> <p>18 MR. BISS: Object to the form.</p> <p>19 THE WITNESS: I do not.</p> <p>20 BY MS. BOLGER:</p> <p>21 Q. Sorry. I don't mean to keep asking</p> <p>22 you the same question.</p> <p>23 You actually cited Mr. O'Sullivan</p> <p>24 in your work, right?</p>	<p style="text-align: right;">Page 48</p> <p>1 A. (Witness complies.)</p> <p>2 Yes.</p> <p>3 Q. Footnote 52 is an article published</p> <p>4 by Donie O'Sullivan in Madison.com, right?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And you relied on that in</p> <p>7 putting together the book?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And, actually, the report at</p> <p>10 issue in this case, the CNN report at issue</p> <p>11 in this case, is also cited in your book,</p> <p>12 right?</p> <p>13 A. Prob- -- I don't know.</p> <p>14 Q. Okay. Turn to Page 39.</p> <p>15 A. 39.</p> <p>16 (Witness complies.)</p> <p>17 Yes.</p> <p>18 Q. Sorry. I'm having a hard time</p> <p>19 turning to Page 39.</p> <p>20 In that final graph on Page 39, the</p> <p>21 two final sentences -- three final -- final</p> <p>22 sentences, "CNN Donie O'Sullivan attended a</p> <p>23 QAnon meeting in Arizona back in October 2020</p> <p>24 before the election."</p>
<p style="text-align: right;">Page 47</p> <p>1 A. Probably. I can't say off the top</p> <p>2 of my head, but it sounds right.</p> <p>3 Q. I'm going to hand you your book,</p> <p>4 which I suspect you probably know by heart.</p> <p>5 But hold on.</p> <p>6 A. Thank you for buying.</p> <p>7 Q. I know, right?</p> <p>8 Exhibit-413 will be the book,</p> <p>9 Pastels and Pedophiles" by Mia Bloom and</p> <p>10 Sophia Moskalenko.</p> <p>11 - - -</p> <p>12 (Whereupon, Exhibit-413, Book,</p> <p>13 "Pastels and Pedophiles", was</p> <p>14 marked for identification.)</p> <p>15 - - -</p> <p>16 BY MS. BOLGER:</p> <p>17 Q. So this is your book that you</p> <p>18 published, yes?</p> <p>19 A. Indeed.</p> <p>20 Q. Okay. You're the author in the</p> <p>21 book, right?</p> <p>22 A. I am, indeed.</p> <p>23 Q. Okay. If you will please turn to</p> <p>24 Page 216, Footnote 52.</p>	<p style="text-align: right;">Page 49</p> <p>1 A. Mm-humm.</p> <p>2 Q. And it goes on from there.</p> <p>3 That's this report, correct?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And if you look at that --</p> <p>6 if you look at that footnote, which is on</p> <p>7 Page 203, you'll see Footnote 5,</p> <p>8 "Donie O'Sullivan, Watch CNN Go Inside a</p> <p>9 Gathering of QAnon Followers," right?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And you relied on that page</p> <p>12 out of the book?</p> <p>13 A. Yes.</p> <p>14 Q. Before we talk about your book,</p> <p>15 other than -- just to close my loop on this,</p> <p>16 other than the things we talked about, what</p> <p>17 other ex- -- did you offer any other expert</p> <p>18 opinions in your opening report?</p> <p>19 A. I think that those are the only</p> <p>20 ones.</p> <p>21 Q. How many times have you seen the</p> <p>22 CNN report at issue in this case?</p> <p>23 A. I saw it twice for the work I did</p> <p>24 on my expert opinion. I don't know how many</p>

<p style="text-align: right;">Page 50</p> <p>1 times I saw it in preparation for the book. 2 I don't remember. 3 Q. To the best of your memory in the 4 video, what do Jack and Leslie Flynn do? 5 A. They stand in line with other 6 members of their family, and General Flynn is 7 in the middle of that line. 8 They have their right hand raised, 9 and they recite -- after General Flynn who 10 reads off of his phone screen -- the oath to 11 the office, followed by the phrase, "Where We 12 Go One, We Go All." 13 Q. Okay. 14 MS. BOLGER: Can we -- can we 15 call up that video, Lindsey? 16 Hello. 17 THE CONCIERGE: This is Matt. 18 Which tab is it? 19 MS. BOLGER: Hey, Matt, I 20 don't know. Lindsey will tell you. 21 It's the report at issue. 22 Where did Lindsey go? 23 MS. CHERNER: Yeah, this is 24 going to take a minute.</p>	<p style="text-align: right;">Page 52</p> <p>1 report that's this lawsuit's about, and you 2 did and your description was a little bit 3 off, so I want to show you the report, and, 4 then, we'll talk about it. 5 MS. BOLGER: So, Matt, can you 6 play the report, please? 7 THE COURT REPORTER: Do you 8 want me to take all this down, or 9 just put "(video playing)"? 10 MS. BOLGER: No. 11 THE COURT REPORTER: Okay. 12 MS. BOLGER: This one, no. 13 (Video playing.) 14 MS. BOLGER: Can you stop? 15 The sound is off, or is it on mute? 16 Can you go back just a little. 17 THE CONCIERGE: How far back 18 would you like me to go? 19 MS. BOLGER: Right there's 20 fine, Matt, as long as the sound is 21 caught up. 22 (Video playing.) 23 MS. BOLGER: Okay. Stop. 24 You can stop, Matt.</p>
<p style="text-align: right;">Page 51</p> <p>1 MS. BOLGER: Okay. 2 You know, why don't we take, 3 like, a two-minute break. I'll run 4 to the bathroom, and he will call 5 it up, so we don't waste time, so 6 we'll take a break. 7 THE VIDEOGRAPHER: The time is 8 10:50. We are going off the video 9 record. This ends Media Unit 10 Number 1. 11 - - - 12 (Whereupon, there was a brief 13 recess held off the video record.) 14 - - - 15 THE VIDEOGRAPHER: One moment. 16 The time is 11:06. We are going 17 back on the video record. This 18 begins Media Unit Number 2. 19 - - - 20 (Back on the video record.) 21 - - - 22 BY MS. BOLGER: 23 Q. So, before we took a break, I had 24 asked you to describe the content of the CNN</p>	<p style="text-align: right;">Page 53</p> <p>1 - - - 2 (Video stopped.) 3 - - - 4 BY MS. BOLGER: 5 Q. Okay. So despite the -- the -- the 6 sound glitch, which was slightly before the 7 portion I wanted to talk to you about, you'll 8 notice that before the break you thought in 9 the video Jack and Leslie Flynn stood next to 10 General Flynn, raised their hands, and 11 repeated what he said. 12 But he does not do that, right? 13 A. That's right. I made a mistake. 14 Q. Okay. The only person that talks 15 in that video is General Flynn, right? 16 A. That's right. 17 Q. Okay. And, so, no one who watched 18 this video would have any knowledge about 19 whether or not Jack or Leslie Flynn said 20 anything, right? 21 MR. BISS: Object to the form. 22 Speculation. 23 MS. BOLGER: She's allowed to 24 speculate. She's an expert</p>

<p style="text-align: right;">Page 54</p> <p>1 witness.</p> <p>2 MR. BISS: She can't</p> <p>3 speculate.</p> <p>4 MS. BOLGER: She can.</p> <p>5 THE WITNESS: I'm not sure</p> <p>6 what, you know, millions of people</p> <p>7 who watched this think en masse. I</p> <p>8 don't know.</p> <p>9 BY MS. BOLGER:</p> <p>10 Q. Okay. That's not quite my</p> <p>11 question.</p> <p>12 A. What's your question?</p> <p>13 Q. Was there anything that the</p> <p>14 video --</p> <p>15 A. Mm-humm.</p> <p>16 Q. -- that indicated that Jack or</p> <p>17 Leslie Flynn ever said anything?</p> <p>18 A. You're asking my personal opinion?</p> <p>19 Q. I'm asking you in the video.</p> <p>20 A. Right.</p> <p>21 Q. Did Jack and Leslie Flynn say</p> <p>22 anything?</p> <p>23 A. They didn't say anything in the</p> <p>24 video here, no.</p>	<p style="text-align: right;">Page 56</p> <p>1 and the banner says, "QAnon Followers," and</p> <p>2 one person says something.</p> <p>3 It's not unreasonable to think that</p> <p>4 other people were repeating after them.</p> <p>5 Maybe I am prejudiced by having seen the</p> <p>6 video that's not here. I can't make an</p> <p>7 uneducated opinion now having seen it a bunch</p> <p>8 of times.</p> <p>9 You've seen I've even conflated my</p> <p>10 experience of watching this with my</p> <p>11 experience of watching this July 4th video</p> <p>12 that was also provided to me.</p> <p>13 So these things are now all part of</p> <p>14 my impression, and I think you would be</p> <p>15 better off asking a person naive to that</p> <p>16 impression of what they might or might not</p> <p>17 think.</p> <p>18 Q. So you -- just for the purpose of</p> <p>19 the record, we all know what the two videos</p> <p>20 are that we're talking about, but let's be</p> <p>21 very explicit.</p> <p>22 When you talk about the July 4th</p> <p>23 video, you are just talking about the video</p> <p>24 in which the Flynnns take the oath of office,</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. So to believe -- to know that they</p> <p>2 said something, you would have to have</p> <p>3 knowledge outside of the video, right?</p> <p>4 A. Or you could make reasonable</p> <p>5 assumptions.</p> <p>6 Q. Why would that -- why would that be</p> <p>7 a reasonable assumption?</p> <p>8 A. Well, if people are, you know,</p> <p>9 portrayed in a meeting of QAnon followers'</p> <p>10 segment with their hands up and one of them</p> <p>11 is saying something, one could make a</p> <p>12 reasonable assumption that others are saying</p> <p>13 something in response.</p> <p>14 Q. What would the possible basis of an</p> <p>15 assumption that other people were talking be,</p> <p>16 how can you assume someone spoke based on</p> <p>17 this video, in which it says, "National</p> <p>18 Security" -- "phrase repeated by National</p> <p>19 Security Adviser Michael Flynn."</p> <p>20 How can you make an assumption that</p> <p>21 anybody else spoke, other than National</p> <p>22 Security Advisor Michael Flynn?</p> <p>23 A. Well, the video portrays people</p> <p>24 standing with their hands up, all lined up,</p>	<p style="text-align: right;">Page 57</p> <p>1 they say "Where We Go One, We Go All." They</p> <p>2 say, "God bless America."</p> <p>3 And they posted that there on</p> <p>4 July 4th and July 5th of 2020, correct?</p> <p>5 A. Correct. That's what I mean.</p> <p>6 Q. Okay. And that -- that video,</p> <p>7 you'll agree with me, was published by the</p> <p>8 Flynnns?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. Let's just start out with a</p> <p>11 very really simple thing, and tell me what</p> <p>12 you -- what QAnon is.</p> <p>13 A. QAnon is a -- a large online</p> <p>14 following of people who believe in a set of</p> <p>15 baseless and debunked conspiracy theories.</p> <p>16 There is a very large number of these. It is</p> <p>17 commonly believed among researchers now and</p> <p>18 journalists that there are three main tenets</p> <p>19 of QAnon beliefs.</p> <p>20 These include the idea that a -- an</p> <p>21 international cabal of satan worshipping</p> <p>22 sadists has taken over the government and the</p> <p>23 media and maybe they're running a world</p> <p>24 government.</p>

<p style="text-align: right;">Page 58</p> <p>1 Also, the idea that Donald Trump, 2 who is known as Q+ is secretly fighting 3 behind the scene to bring the cabal down and 4 to arrest and execute the cabal members, 5 among whom QAnon followers count major 6 democratic politicians, as well as some 7 celebrities, and even the pope. 8 And the last tenet of QAnon belief, 9 as it's called sometimes, is the idea that 10 some of these cabal members, including 11 Hollywood celebrities kidnap and torture 12 children in order to harvest the children's 13 blood, which they believe, then, becomes 14 enriched with adrenochrome, a substance that 15 they claim would give a person ingesting it, 16 you know, vitality and almost super powers. 17 So those are three major 18 foundational tenets of QAnon, but there is a 19 host of other ones, and it's expanding even 20 now. And these include ideas about lasers in 21 outer space that are controlled by Jews and 22 used to burn out wild forests in California 23 to make room for a super speed highway. 24 The idea that they're human-lizard</p>	<p style="text-align: right;">Page 60</p> <p>1 I could go on, but I think that 2 gives you an idea. 3 Q. I will ask you: Is the belief that 4 the 2020 election was somehow stolen by 5 either flipping votes or dumping votes also 6 part of that umbrella conspiracy theories? 7 A. Yes. Thank you. 8 That is. 9 Q. Okay. And as I understand your 10 research and I think your answer, you don't 11 have to believe in all of that to be a QAnon 12 follower, right? 13 A. Correct. 14 Q. It's kind of a -- in your words, an 15 a la carte belief system? 16 A. Yes. 17 Q. What is a Q-drop? 18 A. A Q-drop is a -- one of almost 19 5,000 cryptic messages that appeared first on 20 these messenger boards, like 4chan and 8kun, 21 that were posted by somebody who signed Q, 22 referencing and implying a top level 23 government clearance incidentally from the 24 Energy Department, but that's the kind of</p>
<p style="text-align: right;">Page 59</p> <p>1 or human-serpent hybrids living among us, and 2 are going to take over the world unless 3 they're stopped. 4 The idea that the earth is flat, 5 that COVID is either a hoax, or it is a 6 bio-weapon designed -- one -- one theory is 7 that Bill Gates is using it to control 8 population growth. 9 Ideas about vaccines as being 10 poisons or tracking devices. Ideas about 11 COVID being a biological weapon. I said that 12 already, right. 13 That JFK, Jr. is not dead in a 14 plane crash but actually alive and well and 15 is the Q, the poster of the original Q-drops, 16 these cryptic messages that started the QAnon 17 community. 18 You know, med beds, this idea that 19 the government has come to possess alien 20 technology; these beds that if you lay it in, 21 it will heal you of everything, and, so, 22 they're hoarding it for themselves while 23 they're charging everybody an arm and a leg 24 for medical treatment.</p>	<p style="text-align: right;">Page 61</p> <p>1 nuance that the QAnon doesn't bother with. 2 But the reference to the government 3 clearance suggested that these cryptic posts 4 carried some top secret information that 5 nobody else had access to, and these posts at 6 different times mentioned, for example, 7 Hillary Clinton, Donald Trump, and invited 8 people to do their own research on these 9 vaguely suggested connections between things 10 that are not connected at all, and they 11 became known as Q-drops in the QAnon 12 community of followers, and, now, they're 13 also referenced as such by researchers and 14 journalists. 15 Q. When was the last Q-drop? 16 A. Q resurfaced very recently. I 17 don't have the date for you. It's available 18 on the internet for those who seek the truth 19 and said something, "Shall we play." That 20 was just very recently. I don't have the 21 date. 22 Q. Okay. How many Q-drops mention the 23 phrase, "Where We Go One, We Go All"? 24 A. I don't have the number for you,</p>

<p style="text-align: right;">Page 62</p> <p>1 but, again, that's information that's easily 2 obtainable. 3 Q. Is it a small number? A large 4 number? 5 A. It depends on what's small and 6 large. 7 Q. Okay. 8 A. It's -- 9 Q. Is it more than 50? 10 A. It sounds like it should be -- 11 it's -- it's a fairly, you know, substantial 12 number. I think it might be 50 or more. 13 Q. Okay. How about General Flynn? 14 A. Who about General Flynn? 15 Q. How about Q-drops mention 16 General Flynn? 17 A. I don't have these numbers for you. 18 I'm sorry. I don't keep them in my head. 19 Q. Are you aware that he has -- that 20 General Flynn is mentioned in Q-drops? 21 A. Yes, I am. 22 Q. Okay. And are you aware that he's 23 mentioned in more than one Q-drop? 24 A. I am.</p>	<p style="text-align: right;">Page 64</p> <p>1 A. It is, and it isn't. It's a term 2 that QAnon uses, but I also use it to talk 3 about the storm. 4 Q. Okay. How about "The Great 5 Awakening"? 6 A. Again, it is, and it isn't. It's a 7 term that QAnon uses, but it's been around 8 since the enlightenment era, and it's 9 associated with some historical events, which 10 is also the case with QAnon content. 11 Q. Okay. How about "Follow the white 12 rabbit," other than "Alice in Wonderland"? 13 A. See, and that's actually a very 14 good example because in addition to it being 15 part of "Alice in Wonderland," the reason 16 QAnon uses it is because it was part of "The 17 Matrix" movie, which they reference in their 18 folklore with the blue pill and red pill and 19 the main character was invited to follow the 20 white rabbit where he was looking for truth. 21 Q. The Q persona likes "The Matrix," 22 wouldn't you agree? 23 A. It sounds about right. 24 Q. Okay. I'm going to ask you to look</p>
<p style="text-align: right;">Page 63</p> <p>1 Q. Okay. As a matter of fact, he's 2 mentioned in several, correct? 3 A. Yes. 4 Q. Do you know who "In The Matrix" is? 5 A. Who "In The Matrix" is? 6 Q. Is. 7 A. "In The Matrix" is a name? 8 Q. Yes. 9 A. I don't. 10 Q. Do you know who "Praying Medic" is? 11 A. No. 12 Q. Okay. Do you know who "Veronica 13 Wolfsgate" is? 14 A. I remember the name, but I can't 15 tell you in what connection. 16 Q. Okay. Do you know who "Shady 17 Groove" is? 18 A. No. 19 Q. I think you said you don't know who 20 "JT Wilde" is, right? 21 A. I think that's right. 22 Q. When you -- do you think -- some 23 terms. 24 Is "The Storm" a QAnon term?</p>	<p style="text-align: right;">Page 65</p> <p>1 back at your book, again, at Page 18. 2 A. (Witness complies.) 3 Q. Actually, you can close it for a 4 second. I'm sorry I didn't ask this. 5 What role, if any, does posting on 6 social media play in QAnon? 7 A. An enormous role. It's their main 8 way of communicating with each other and with 9 the world. 10 Q. Okay. In fact, Q had -- Q -- the Q 11 persona says -- means that they're ready, 12 right? 13 A. I'm sorry, can you repeat that. 14 Q. The Q persona said or means -- 15 A. Persons. 16 Q. Right. 17 That's why I was using "persona." 18 I thought it would catch 19 everybody -- is memes that they're ready, is 20 memes that they're ready, right? 21 A. Yes. 22 Q. So they're kind of directed by Q to 23 use memes, right? 24 A. Yes.</p>

<p style="text-align: right;">Page 66</p> <p>1 Q. And to speed things up, they use 2 memes to signal a community, correct? 3 A. Sometimes. Sometimes. I mean, 4 they use memes for all kinds of things. 5 Q. Okay. What kinds of -- in your 6 expertise, when you -- what kinds of things 7 do QAnon followers say in social media to 8 indicate that they are part of the Q 9 movement? 10 A. "Baking The Crumbs," "Follow The 11 White Rabbit," "The Storm Is Coming," "The 12 Great Awakening." 13 There's a whole host of these 14 hashtags, including "Where We Go One, We Go 15 All." 16 Q. You would agree with me that 17 holding a sign that said, "Q Sent Me" would 18 be an indication that you were signaling that 19 you were part of the Q community, right? 20 A. I would say yes. 21 - - - 22 (Whereupon, Exhibit-414, 23 Report, Tab 62, was marked for 24 identification.)</p>	<p style="text-align: right;">Page 68</p> <p>1 BY MS. BOLGER: 2 Q. Okay. 3 MS. BOLGER: What was 414? 4 The report. 5 BY MS. BOLGER: 6 Q. Okay. 415 is a document that is 7 from the internet archive. 8 MR. BISS: Kate, I marked the 9 report as 412. 10 MS. BOLGER: CNN Report. The 11 CNN Report is 415. 12 BY MS. BOLGER: 13 Q. Okay. So if you will look at and 14 turn over to the back of 415, you'll see that 15 this is a Twitter. The tweet is from -- the 16 top tweet is from "RawStory." 17 And it reads, "Michael Flynn's 18 family insists showing them reciting the 19 QAnon oath was actually just showing off a 20 family tradition." 21 And you'll see there's a response 22 at the bottom that says, "Liars. First it 23 inc. the line, "Where We Go One, We Go All," 24 as QAnon supporters use. Second, it's not</p>
<p style="text-align: right;">Page 67</p> <p>1 - - - 2 BY MS. BOLGER: 3 Q. Okay. I'm going to ask you to look 4 at Exhibit-414, which is -- sorry, I have the 5 wrong one -- 6 MS. CHERNER: Are you 7 referring to Tab 62? 8 MS. BOLGER: It is. I just 9 got everything -- everything got 10 all bundled in one. 11 THE WITNESS: Sorry. My legs 12 are too short. I don't reach the 13 floor. 14 - - - 15 (Whereupon, Exhibit-415, 16 Internet Archive Document, CNN 17 Report, was marked for 18 identification.) 19 - - - 20 MS. CHERNER: Exhibit-415, 21 4-1-5. 22 MS. BOLGER: My box is little 23 messed up. 24</p>	<p style="text-align: right;">Page 69</p> <p>1 the only example, "Q Sent Me." 2 It's hard to see on this, but I'm 3 sure Matt can call it up. 4 MS. BOLGER: Matt, can you 5 call up this image? 6 MS. CHERNER: Tab 62, Matt. 7 MS. BOLGER: Right. 8 BY MS. BOLGER: 9 Q. So, then, you'll see there -- 10 there's a gentleman in the picture on the far 11 right, who's wearing a blue shirt, that's 12 Jack Flynn, and he's holding a sign that 13 says, "Q Sent Me," can you see that? 14 A. I can't. If you say --if you -- 15 MR. BISS: I'm going to 16 object -- object to the form. 17 BY MS. BOLGER: 18 Q. Do you have any reason to doubt me? 19 A. I do not. 20 Q. Okay. You can put that aside. 21 A. (Witness complies.) 22 Q. Okay. Now, let's look at your 23 book. 24 A. (Witness complies.)</p>

<p style="text-align: right;">Page 70</p> <p>1 Q. So Page 15 -- 18, sorry.</p> <p>2 A. (Witness complies.)</p> <p>3 Q. In the second paragraph, the last</p> <p>4 sentence, last two sentences, read, "In the</p> <p>5 2020 primaries, there are 97 QAnon-affiliated</p> <p>6 candidates in 30 dates. 24 went on to</p> <p>7 compete in the November 2020 election."</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And do you remember</p> <p>11 including this idea in the book?</p> <p>12 A. I remember talking about it. I</p> <p>13 don't remember writing this, but I did,</p> <p>14 obviously.</p> <p>15 Q. Right. Okay.</p> <p>16 And what source did you rely on</p> <p>17 when you made that statement?</p> <p>18 A. I'd have to look it up.</p> <p>19 Q. Please do. I'll give you a hint.</p> <p>20 It's on Page 200.</p> <p>21 A. Thank you.</p> <p>22 Alex Kaplan --</p> <p>23 Q. Okay.</p> <p>24 A. "Here are QAnon supporters running</p>	<p style="text-align: right;">Page 72</p> <p>1 Q. Okay. So let's talk a look at a</p> <p>2 couple of things.</p> <p>3 So, first of all, let's talk about</p> <p>4 on Page 2 of 80, there at the bottom</p> <p>5 right-hand corner.</p> <p>6 A. Mm-humm.</p> <p>7 Q. Okay. It talks about</p> <p>8 Lauren Boebert. And all of the candidates</p> <p>9 listed in this article are referred to as</p> <p>10 QAnon supporters running for Congress in</p> <p>11 2020, right?</p> <p>12 A. That's right.</p> <p>13 Q. Okay. And said --</p> <p>14 Lauren Boebert -- Boebert -- Boebert, who is</p> <p>15 the first person in the article, says, "She's</p> <p>16 also said that everything that she heard</p> <p>17 about QAnon is only motivating and</p> <p>18 encouraging and bringing people together</p> <p>19 stronger. And if this is real, then it can</p> <p>20 be really great for country."</p> <p>21 Do you see that?</p> <p>22 A. Which line? I'm sorry. Can you --</p> <p>23 Q. I can.</p> <p>24 A. I'm going to get my classes</p>
<p style="text-align: right;">Page 71</p> <p>1 for Congress in 2020."</p> <p>2 Q. Okay. So that was the source for</p> <p>3 that sentence?</p> <p>4 A. It appears to be.</p> <p>5 Q. Okay. There's no reason to doubt</p> <p>6 that, right?</p> <p>7 A. That's right.</p> <p>8 Q. Okay. So let's take a look at</p> <p>9 Alex Kaplan.</p> <p>10 A. Can I close this?</p> <p>11 Q. Yes.</p> <p>12 MS. CHERNER: This is Tab 7,</p> <p>13 Exhibit-416.</p> <p>14 - - -</p> <p>15 (Whereupon, Exhibit-416, Alex</p> <p>16 Kaplan Article Printout, was marked</p> <p>17 for identification.)</p> <p>18 - - -</p> <p>19 BY MS. BOLGER:</p> <p>20 Q. So Exhibit-416 is, as Lindsey just</p> <p>21 said, a printout of the Alex Kaplan article</p> <p>22 referred to in that Footnote 55 in your book,</p> <p>23 and if you -- do you agree with me on that?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 73</p> <p>1 because --</p> <p>2 Q. I'm of the age where I need</p> <p>3 glasses, so I -- I hear -- feel your pain.</p> <p>4 A. Okay.</p> <p>5 Q. Okay. So in the paragraph around</p> <p>6 Lauren Boebert --</p> <p>7 A. Yep.</p> <p>8 Q. -- six lines up from the top,</p> <p>9 there's a sentence that begins, "She also</p> <p>10 said everything she heard about QAnon is only</p> <p>11 motivating and encouraging and bringing</p> <p>12 people together stronger and if this is real,</p> <p>13 then it can be really great for our country."</p> <p>14 Do you see that?</p> <p>15 A. Yes, I do.</p> <p>16 Q. Okay. And that -- those were the</p> <p>17 kind of statements that made Media Matters</p> <p>18 and you all list her as a QAnon candidate,</p> <p>19 right?</p> <p>20 MR. BISS: Object to form.</p> <p>21 THE WITNESS: I -- I'm sorry.</p> <p>22 I don't know that those were the</p> <p>23 kinds of statement that made</p> <p>24 Mr. Kaplan list her as a QAnon</p>

<p style="text-align: right;">Page 74</p> <p>1 candidate.</p> <p>2 As a matter of fact, there are</p> <p>3 a bunch of other things in this</p> <p>4 very paragraph --</p> <p>5 MS. BOLGER: Okay. You can</p> <p>6 read them all.</p> <p>7 THE WITNESS: -- that might</p> <p>8 have convinced Mr. Kaplan.</p> <p>9 Q. Sure.</p> <p>10 A. Including in May, Boebert also</p> <p>11 appeared on Patriot Soapbox, a major QAnon</p> <p>12 YouTube account that subscribes to multiple</p> <p>13 QAnon channels.</p> <p>14 And I don't know if that's an</p> <p>15 exhaustive list of the reasons that</p> <p>16 Mr. Kaplan used to classify Ms. Boebert.</p> <p>17 However, I -- we did reference the original</p> <p>18 source. So whoever, you know, may have</p> <p>19 questions about that can ask Mr. Kaplan.</p> <p>20 Q. Well, when you read this article,</p> <p>21 which you then included in your book --</p> <p>22 A. Mm-humm.</p> <p>23 Q. -- you accepted that these were</p> <p>24 QAnon supporters because you wrote the</p>	<p style="text-align: right;">Page 76</p> <p>1 Ayyadurai has tweeted a misspelled version of</p> <p>2 the QAnon slogan of, "Where We Go One, We Go</p> <p>3 All," often abbreviated -- often abbreviated,</p> <p>4 "WWG1WGA," and he has re-tweeted a tweet that</p> <p>5 contained a QAnon slogan.</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. And that's the entirety of what he</p> <p>9 says about Shiva Ayyadurai, right?</p> <p>10 A. That is an entirety of what he says</p> <p>11 here, yes.</p> <p>12 Q. Okay. Look at Page 10.</p> <p>13 A. (Witness complies.)</p> <p>14 Q. There is a gentleman by the name of</p> <p>15 Ron Curtis. And it says, "Ron Curtis was a</p> <p>16 Republican candidate who ran in Hawaii's</p> <p>17 First Congressional District. He had one</p> <p>18 Republican primary on August 8th. He has</p> <p>19 written the QAnon slogan misspelled while</p> <p>20 quote "tweeting" a likely fake account of</p> <p>21 Vincent Fusca, a man many QAnon supporters</p> <p>22 incorrectly believe is actually John F.</p> <p>23 Kennedy, Jr. in disguise. Curtis has also</p> <p>24 re-tweeted the QAnon slogan more than once,</p>
<p style="text-align: right;">Page 75</p> <p>1 sentence, "In 2020 primaries there were 97</p> <p>2 QAnon-affiliated candidates in 30 states,"</p> <p>3 right?</p> <p>4 A. Yes.</p> <p>5 Q. So you accepted that Mr. Kaplan's</p> <p>6 reasons for why these were QAnon-affiliated</p> <p>7 candidates was correct, right?</p> <p>8 A. Yes. Can I -- can I augment that?</p> <p>9 Q. Sure.</p> <p>10 A. Would it -- so without checking</p> <p>11 Mr. Kaplan's data or diving into it</p> <p>12 ourselves. We -- we did not -- we relied on</p> <p>13 Mr. Kaplan's reporting, and that is the</p> <p>14 reason we referenced the original</p> <p>15 publication, as opposed to saying it, you</p> <p>16 know, without a reference, "Lauren Boebert</p> <p>17 was."</p> <p>18 Q. Okay. Okay. Page 4, there's a</p> <p>19 reference to Shiva Ayyadurai. And it says</p> <p>20 here, Shiva Ayyadurai was a Republican who</p> <p>21 ran as a write-in candidate for the US Senate</p> <p>22 in Massachusetts. He'd been defeated in a</p> <p>23 Republican primary on September 1st, and had</p> <p>24 subsequently launched a write-in campaign.</p>	<p style="text-align: right;">Page 77</p> <p>1 and has also re-tweeted various videos and</p> <p>2 hashtags for QAnon supporters giving an oath</p> <p>3 supporting the conspiracy theory.</p> <p>4 On Facebook, Curtis has posted a</p> <p>5 link to a tweet urging that the QAnon</p> <p>6 movement must not become comatose."</p> <p>7 Do you see that?</p> <p>8 A. I do.</p> <p>9 Q. Okay. And there's -- there's a</p> <p>10 quote there.</p> <p>11 Do you see that? There's a quote</p> <p>12 there -- a tweet there?</p> <p>13 A. Yes, I do.</p> <p>14 Q. And that's the entirety of what</p> <p>15 made Alex Kaplan put Ron Curtis on the list</p> <p>16 of QAnon supporters running for Congress?</p> <p>17 MR. BISS: Object. Object to</p> <p>18 the form.</p> <p>19 THE WITNESS: I don't know</p> <p>20 that that last part is true.</p> <p>21 BY MS. BOLGER:</p> <p>22 Q. That's the only thing in the</p> <p>23 article?</p> <p>24 A. That's the only thing in the</p>

<p style="text-align: right;">Page 78</p> <p>1 article. It doesn't mean that what's in the 2 article is the entirety of the basis for 3 Mr. Kaplan's opinion. 4 Q. Okay. I'll accept your -- I'll 5 accept that. 6 Turn to Page -- Page 11, which is 7 actually should be the next page. 8 A. (Witness complies.) 9 Q. Start with, if you look at the 10 bottom of the page -- 11 A. Mm-humm. 12 Q. -- Alison Hadden California. 13 A. Mm-humm. 14 Q. "Alison Hayden was a Republican 15 candidate who ran in California's 15th 16 Congressional District. Hayden came in 17 second in a non-partisan blanket primary on 18 March 3rd, which meant under California 19 election law she appeared on the ballot in 20 November's general election. On her campaign 21 Twitter account, Hayden has repeatedly 22 re-tweeted content explicitly promoting 23 QAnon, along with repeatedly tweeting the 24 QAnon hashtag, "#a great awakening." She has</p>	<p style="text-align: right;">Page 80</p> <p>1 posted the QAnon slogan on her Twitter and 2 Facebook campaign accounts, along with a 3 photo of a bell with a slogan on it." 4 You'll see there it is. "Tracy 5 Lovvorn. Never forget we are all in this 6 together. #WWG1WGA#, #JFK, #ChooseLovv." 7 And, then, you'll see there's an 8 image of a brass bell. 9 A. Yes. 10 Q. And that is the entirety of the 11 information Alex Kaplan included in this 12 article about who a QAnon supporter was that 13 you then relied on in your book, right? 14 A. It's true. 15 Q. Take a look at Page 19. 16 A. (Witness complies.) 17 Q. I'm going to ask you to take a look 18 at the section about Theresa Raborn from 19 Illinois. It says, "Theresa Raborn was a 20 Republican candidate who ran in Illinois's 21 2nd Congressional District by default, 22 running unopposed. While quote-tweeting 23 "amen and congrats" to a video of former 24 National Security Advisor Michael Flynn,</p>
<p style="text-align: right;">Page 79</p> <p>1 also tweeted the QAnon hashtag, and the 2 spinoff hashtag of the QAnon slogan 3 #WWG1WGAWORLDWIDE, on what Ballotpedia lists 4 as her personal Twitter account." 5 And there's a parenthetical, "(She 6 has tweeted the QAnon slogan and #great 7 awakening)." 8 Do you see that? 9 A. I do. 10 Q. Okay. And that was the information 11 that Mr. Kaplan chose to include in this 12 article about who a QAnon supporting 13 candidate is? 14 A. That is the information he chose to 15 include. 16 Q. Flip on a little bit to Page 13. 17 A. Mm-humm. 18 (Witness complies.) 19 Q. There is Tracy Lovvorn in 20 Massachusetts. It says, "Tracy Lovvorn was a 21 Republican candidate who ran in Massachusetts 22 2nd Congressional District. She won the 23 Republican primary on September 1st by 24 default, running unopposed. Lovvorn has</p>	<p style="text-align: right;">Page 81</p> <p>1 giving an oath supporting QAnon, Raborn wrote 2 the QAnon slogan. Raborn has since told the 3 Washington Post that Flynn's video endorsing 4 QAnon made it appear more legitimate to her 5 and, 'seemed to give a lot of validity to 6 people who support me who also happen to 7 follow Q." 8 Do you see that? 9 A. Mm-humm. 10 Q. Okay. And on the next page you see 11 a picture of the tweet and there is 12 Ms. Raborn's tweet re-tweeting General Flynn. 13 You'll see General Flynn's tweet 14 has "#take the oath." 15 Do you agree with me? 16 A. Yes. 17 Q. Okay. And you'll see that all of 18 the Flynn's are in that picture, right? 19 A. Yes. 20 Q. Okay. "Go Jack Flynn" is one of 21 the handles there, right? 22 A. Yes. 23 Q. Okay. And that's all of the 24 information that Alex Kaplan included in his</p>

<p style="text-align: right;">Page 82</p> <p>1 book -- in this article about QAnon 2 supporting candidates that you then put in 3 your book, right? 4 A. That is correct. 5 Q. Okay. Let's look at Johnny Teague, 6 Page 22. 7 A. (Witness complies.) 8 Q. It says, "Johnny Teague was a 9 Republican candidate who ran in Texas's 9th 10 Congressional District. He had won the 11 Republican primary on March 3rd. Teague on 12 his campaign account has re-tweeted content 13 explicitly promoting QAnon, including 14 re-tweeting a video of QAnon supporters 15 giving an oath supporting a conspiracy 16 theory. He also re-tweeted a false 17 conspiracy theory pushed by some QAnon 18 supporters that John F. Kennedy, Jr. is 19 secretly still alive despite dying in a plane 20 crash, and has tweeted a video from a QAnon 21 account with a major following." 22 Do you see that? 23 A. I do. 24 Q. Okay. And that is the -- you can</p>	<p style="text-align: right;">Page 84</p> <p>1 from Jack Flynn, was marked for 2 identification.) 3 - - - 4 BY MS. BOLGER: 5 Q. Let's take a look at Exhibit-417 -- 6 A. (Witness complies.) 7 Q. -- which is Tab 42, which is a 8 tweet from Jack Flynn, in which he says, 9 "There is nothing wrong with QAnon, just 10 people doing their own research and learning 11 independence of thought to find the truth. 12 If it triggers the daylights out of fools 13 like yourselves, all the better. Don't you 14 get it? It's a simple yet complex, just like 15 meritage wine." 16 Do you see that? 17 A. I do. 18 Q. Okay. Similar tweets, right? 19 A. Hmm...yeah, probably. Let me see a 20 second. Where is the co -- in some ways, it 21 is, and in some ways it isn't. 22 Q. Both of them are expressing support 23 for the idea of QAnon, correct? 24 A. No, I wouldn't say that. I would</p>
<p style="text-align: right;">Page 83</p> <p>1 check the next page. There's nothing there. 2 That is -- that is what Alex Kaplan 3 thought -- that is what Alex Kaplan 4 concluded -- included in his article to say 5 that Johnny Teague is a QAnon supporter, 6 right? 7 A. Yes. 8 Q. Okay. Sorry, Dr. Moskalenko, I 9 have a lot of paper. 10 A. That's all right. 11 Q. Okay. So Page 27, which we just 12 looked -- looked through, and let's go back 13 to Lauren Boebert -- Boebert, which is on 14 Page 2 of 80. 15 A. (Witness complies.) 16 Q. And you'll see that one of the 17 things that she says here is, "QAnon is only 18 motivating and encouraging and bringing 19 people together stronger and if this is real, 20 then it can be really great for our country," 21 do you see that? 22 A. (Witness indicating.) 23 - - - 24 (Whereupon, Exhibit-417, Tweet</p>	<p style="text-align: right;">Page 85</p> <p>1 say that Lauren Boebert's does because it 2 is -- it is saying is -- "QAnon is only 3 motivating an encouraging and bringing people 4 together stronger." 5 This part, to me, is an expression 6 of support. In Jack Flynn's tweet, there is 7 no parallel to this kind of expression of 8 support. 9 Q. It says, "There is nothing wrong 10 with QAnon, just people doing their own 11 research and learning independence of thought 12 to find the truth." 13 That's a positive reflection on 14 what QAnon is, is it not? 15 A. I would say that it's a neutral not 16 positive. 17 Q. How is that a natural? It says -- 18 A. "There is nothing wrong with 19 QAnon," to me, is neither positive nor 20 negative. 21 Q. "People doing their own research 22 and learning independence of thought to find 23 the truth," isn't that a positive value? 24 A. It depends on what Jack Flynn</p>

<p style="text-align: right;">Page 86</p> <p>1 considers to be positive values relative to 2 doing your own research. 3 I, for one, do not necessarily see 4 that as a positive value. 5 Q. Is there really any doubt in your 6 mind, sincerely, looking at that tweet, that 7 Jack Flynn is saying that it's a positive 8 value to have people do they own research and 9 learn independence of thought to find the 10 truth -- 11 MR. BISS: Asked and answered. 12 BY MS. BOLGER: 13 Q. -- as you sit here? 14 THE WITNESS: I -- 15 MR. BISS: Asked and answered. 16 THE WITNESS: I do not see 17 that as a positive judgment. 18 BY MS. BOLGER: 19 Q. I didn't ask you if you saw it that 20 way. I asked you if Mr. Flynn does. 21 A. If Mr. Flynn saw it as a positive? 22 Q. I asked you if there's a serious 23 doubt in your mind that Mr. Flynn's sentence, 24 "There's nothing wrong with QAnon, just</p>	<p style="text-align: right;">Page 88</p> <p>1 A. That would also be a neutral 2 expression. They're not on the same scale. 3 Q. You can put that aside. 4 A. (Witness complies.) 5 Q. Let's look at -- I'm just making 6 sure I've got the right thing. 7 - - - 8 (Whereupon, Exhibit-418, 9 Twitter Feed Printout, Tab 34, was 10 marked for identification.) 11 - - - 12 BY MS. BOLGER: 13 Q. Okay. This is Exhibit-418, which 14 is Tab 34. For the record, the -- it has 15 Exhibit-42 because it's taken from another 16 document. 17 Okay. Tab 34 is, again, a printout 18 from Jack Flynn's Twitter feed. 19 If you'll compare that for a second 20 with Page 4 of Exhibit-27, which is -- 21 A. I'm sorry, there's a lot of stuff 22 here. 23 Q. I'll get you there in a second. 24 A. Okay.</p>
<p style="text-align: right;">Page 87</p> <p>1 people doing their own research and learning 2 independence of thought to find the truth." 3 I'm asking you if you really have 4 any serious doubt that that is Mr. Flynn 5 making a positive statement about QAnon? 6 MR. BISS: Asked and answered. 7 This is harassment, Kate. 8 You're just asking the same 9 question over and over, again, 10 raising your voice. 11 THE WITNESS: I don't have 12 doubts. I don't think it's a 13 positive expression. 14 BY MS. GILBERT: 15 Q. Do you think it's a negative 16 expression? 17 A. I said, it's a neutral expression. 18 Q. But it's -- clearly, this phrase, 19 "there is nothing wrong with QAnon," is not a 20 neutral expression. 21 A. I would say that it is a neutral 22 expression. 23 Q. Wouldn't "I don't know about QAnon" 24 be a neutral expression?</p>	<p style="text-align: right;">Page 89</p> <p>1 Q. Get to Page 4 of Exhibit-27. 2 A. (Witness complies.) 3 Q. And you'll see that the -- in the 4 Alex Kaplan article, it talks about 5 Shiva Ayyadurai using the phrase, "WWG1WWGA," 6 do you see that? 7 A. Yes. 8 Q. Okay. If you look at Page 4 of 6 9 in the -- Exhibit-418 -- 10 A. Yes. 11 Q. -- you will see Mr. Flynn 12 re-tweeting, "This is awesome. My friend 13 wanted me to share that she donated this on 14 Friday in memory of her brother. The Patriot 15 family on this platform is Happy Face 16 #WWG1WWGA." 17 Do you see that? 18 A. Yes, I do. 19 Q. Okay. 20 THE VIDEOGRAPHER: Doctor, 21 please move the water bottle. 22 THE WITNESS: This? 23 THE VIDEOGRAPHER: Yes. 24 MS. BOLGER: I need about six</p>

<p style="text-align: right;">Page 90</p> <p>1 inches. Okay.</p> <p>2 - - -</p> <p>3 (Whereupon, Exhibit-419,</p> <p>4 Twitter Feed Printout, Tab 44, was</p> <p>5 marked for identification.)</p> <p>6 - - -</p> <p>7 BY MS. BOLGER:</p> <p>8 Q. And I'm going to show you</p> <p>9 Exhibit-419, which is Tab 44, which is a</p> <p>10 printout from the Wayback Machine of</p> <p>11 Jack Flynn's Twitter feed, dated August 21st,</p> <p>12 2020.</p> <p>13 And you'll see, if you will, turn</p> <p>14 to Page 3 of 7.</p> <p>15 A. (Witness complies.)</p> <p>16 Q. And the third tweet down,</p> <p>17 "Jack Flynn, #We Fight Back" tweeted, "I</p> <p>18 don't know who or what Q is, so there's that,</p> <p>19 but no one's hurting each other. It's</p> <p>20 civilized. Encouraging people" --</p> <p>21 "civilized. Encouraging people to learn</p> <p>22 independently supports Trump and the</p> <p>23 Constitution so WTF. #WWG1WGA."</p> <p>24 Do you see that?</p>	<p style="text-align: right;">Page 92</p> <p>1 encouraging people to learn independently.</p> <p>2 Supports Trump and the Constitution."</p> <p>3 So there's no outrage in that</p> <p>4 tweet.</p> <p>5 A. Well, I can -- I can imagine, but I</p> <p>6 don't need to imagine because you should ask</p> <p>7 Jack Flynn what he meant. He's still alive</p> <p>8 and well, thank God, when he typed, "WTF."</p> <p>9 Q. And I'll have to ask Jack Flynn. I</p> <p>10 get to ask you, too.</p> <p>11 A. Okay.</p> <p>12 Q. It's the joys of a deposition.</p> <p>13 A. Okay.</p> <p>14 Q. There's nothing in that tweet that</p> <p>15 expresses outrage, is there?</p> <p>16 A. It -- it could if he's arguing</p> <p>17 against something that suggested that QAnon</p> <p>18 was hurting other people.</p> <p>19 So the second part of his tweet</p> <p>20 seems to be arguing with a suggestion that</p> <p>21 QAnon is hurting each other or some other</p> <p>22 people or is not civilized, and in that sense</p> <p>23 it could express outrage.</p> <p>24 That's my reading on it.</p>
<p style="text-align: right;">Page 91</p> <p>1 A. I do.</p> <p>2 Q. What does "WTF" mean?</p> <p>3 MR. BISS: Seriously, Kate.</p> <p>4 BY MS. BOLGER:</p> <p>5 Q. For the record, what does it mean?</p> <p>6 A. "What the fuck."</p> <p>7 Q. Right.</p> <p>8 So what do you think "what" -- what</p> <p>9 does "what the fuck" means?</p> <p>10 A. "What the fuck" means what the</p> <p>11 fuck.</p> <p>12 Q. It means "so what," right, would</p> <p>13 you describe it as...</p> <p>14 A. It could mean a bunch of different</p> <p>15 things. It could mean outrage. It could</p> <p>16 mean surprise. It could mean -- I don't know</p> <p>17 exactly what it means, right here, in this</p> <p>18 context.</p> <p>19 Q. It pretty clearly doesn't mean</p> <p>20 outrage, though, right?</p> <p>21 A. Why not?</p> <p>22 Q. Because he's saying, "I don't know</p> <p>23 what or what Q is, so there's that, but no</p> <p>24 one's hurting each other. It's civilized</p>	<p style="text-align: right;">Page 93</p> <p>1 Q. But not with QAnon.</p> <p>2 A. Right. I mean, with some</p> <p>3 suggestion of --</p> <p>4 Q. But it -- it --</p> <p>5 A. -- QAnon doing these things.</p> <p>6 Q. It -- it would be expressing</p> <p>7 outrage at the idea that QAnon was hurting</p> <p>8 people.</p> <p>9 A. Or confusion about it.</p> <p>10 Q. Okay. He doesn't think QAnon's</p> <p>11 hurting people though, right?</p> <p>12 A. He doesn't.</p> <p>13 Q. Okay. And he writes, "#WWG1WGA,"</p> <p>14 right?</p> <p>15 A. Yes.</p> <p>16 Q. And that's exactly what</p> <p>17 Shiva Ayyadurai tweeted out that got him on</p> <p>18 Alex Kaplan's list, right --</p> <p>19 MR. BISS: Object to form.</p> <p>20 BY MS. BOLGER:</p> <p>21 Q. -- with a typo?</p> <p>22 A. Okay. So you're comparing</p> <p>23 Mr. Kaplan's determination from 2020 with</p> <p>24 mine today.</p>

<p style="text-align: right;">Page 94</p> <p>1 Q. No. I'm actually asking you 2 specifically. 3 In the Kaplan's article -- 4 A. Right. 5 Q. -- Shiva Ayyadurai is on his list 6 for saying, "#WWG1WGA," correct? 7 A. I don't know if that's the only 8 reason, because I'm not Mr. Kaplan -- 9 Q. That's fine. 10 A. -- and I don't know his methods. 11 Q. Right now, as you see in front of 12 you -- 13 A. It is what Mr. -- it is what 14 Mr. Kaplan listed as the reason for including 15 him. 16 Q. Okay. And Jack Flynn has 17 "#WWG1WGA" right there, correct? 18 A. Correct. 19 Q. Okay. 20 - - - 21 (Whereupon, Exhibit-420, Jack 22 Flynn Twitter Printout, Tab 37, was 23 marked for identification.) 24 - - -</p>	<p style="text-align: right;">Page 96</p> <p>1 "Page 5 of 7" in the bottom right-hand 2 corner, you'll see there's a tweet from 3 Sharleta2468 saying, "#TakeTheOath," do you 4 see that? 5 A. Yes. 6 - - - 7 (Whereupon, Exhibit-421, Jack 8 Flynn Twitter Printout, Tab 38, was 9 marked for identification.) 10 - - - 11 BY MS. BOLGER: 12 Q. Okay. Then I'm going to show you 13 Exhibit-421, which is Tab 38, which is 14 Jack Flynn's Twitter feeds printed out on 15 July 5, 2020, or as it appeared on July 5, 16 2020. And it's on Page 1 of 6, the second 17 tweet, the first not-pinned tweet, is two 18 women. And it's Sidney Powell, and it says, 19 "I solemnly swear to support and defend." 20 Do you see that? 21 A. I do. 22 Q. Okay. And below that there's 23 Jack Flynn saying, "Excellent. Thank you" to 24 JustInformed Talk tweeting a video with the</p>
<p style="text-align: right;">Page 95</p> <p>1 BY MS. BOLGER: 2 Q. Okay. I'm going to hand you a 3 document marked as Exhibit-420, which is a 4 printout from Jack Flynn's Twitter, dated 5 July 1st, 2020, and it is Tab 37. 6 MR. BISS: Kate, you said, 7 "20." You meant "420," right? 8 MS. BOLGER: I did. Sorry. 9 BY MS. BOLGER: 10 Q. Okay. So if you will look, please, 11 at the second page. 12 A. (Witness complies.) 13 Q. Sorry. Page 2. It's not actually 14 the second page. It has "Page 2 of 7" in the 15 corner. 16 You'll see that in the middle of 17 Jack Flynn's Twitter feed, he re-tweets 18 Barbara Flynn saying, "So proud to #take the 19 oath to defend our Constitution." 20 And, then, it goes on from there. 21 Do you see that? 22 A. I do. 23 Q. Okay. And, then, if you look at 24 the page that's Page 5 of this exhibit,</p>	<p style="text-align: right;">Page 97</p> <p>1 words, "#TakeTheOath." 2 Do you see that? 3 A. Yes. 4 Q. Okay. And on the -- Page 3 of 6, 5 my favorite Twitter handle of this entire 6 case, "Big Moose." 7 Big Moose tweets out, "It's time to 8 retake the oath I first took in 1976 to 9 defend the constitution of my United States 10 of America on today, Independence Day 2020, 11 #TakeTheOath, #WWG1WGA." 12 And you see Jack Flynn re-tweeted 13 that? 14 A. I do. 15 Q. Right below that is General Flynn's 16 tweet of his family taking the oath, right? 17 A. Right. 18 Q. And Jack Flynn re-tweeted that? 19 A. Right. 20 Q. And, then, on the next page, Page 4 21 of 6, the right -- second -- the first full 22 tweet from the bottom says, "Jack Flynn Happy 23 Independence Day. WWG1WGA #KAG2020." 24 And it re-tweets General Flynn's</p>

<p style="text-align: right;">Page 98</p> <p>1 picture of the oath, right, you see that?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Let's look at -- go back to</p> <p>4 Exhibit-27, and let's talk about Ron Curtis</p> <p>5 at Page 10.</p> <p>6 Actually, I don't mean that one.</p> <p>7 I'm sorry.</p> <p>8 Page -- Page 19, Theresa Raborn.</p> <p>9 A. (Witness complies.)</p> <p>10 Q. And you'll see that the reason</p> <p>11 Alex Kaplan lists as including her on his</p> <p>12 list of people who are QAnon supporting</p> <p>13 cabinets is because she quote-tweeted, "Amen</p> <p>14 and congratulations to a video of former</p> <p>15 National Security Advisor Michael Flynn</p> <p>16 giving an oath supporting QAnon. Raborn</p> <p>17 wrote the QAnon slogan. Raborn has since</p> <p>18 told the Washington Post that Flynn's video</p> <p>19 endorsing QAnon made it appear more</p> <p>20 legitimate to her."</p> <p>21 Do you see that?</p> <p>22 A. I do.</p> <p>23 Q. Okay. And tweets she re-published,</p> <p>24 which is on the second page, that's exactly</p>	<p style="text-align: right;">Page 100</p> <p>1 A. I do.</p> <p>2 Q. Okay. And that's what -- one of</p> <p>3 the factors that Kaplan used to put him on</p> <p>4 his list of Q supporting candidates --</p> <p>5 A. It looks like it.</p> <p>6 Q. -- the idea that Q provides for</p> <p>7 deprogramming yourself from mindless</p> <p>8 indoctrination is one of the ideas, right?</p> <p>9 A. He's characterizing not Lisa77, but</p> <p>10 Wesley Morgan, right, Mr. Kaplan?</p> <p>11 Q. Yeah, yeah, yeah, yeah. Sorry.</p> <p>12 Mr. Kaplan is characterizing</p> <p>13 Mr. Morgan as saying that Lisa is correct in</p> <p>14 her assessment of Q, right?</p> <p>15 A. Yes.</p> <p>16 Q. Okay.</p> <p>17 A. Can I just point out --</p> <p>18 Q. Sure.</p> <p>19 A. -- that Mr. Morgan then says,</p> <p>20 "You're 100 percent correct in your</p> <p>21 assessment of Q. We know the truth, and the</p> <p>22 truth will set us free," which could have</p> <p>23 been interpreted as referring to himself as</p> <p>24 part of Q in the "we," but otherwise I agree</p>
<p style="text-align: right;">Page 99</p> <p>1 the same as the one that Jack Flynn</p> <p>2 re-published, right?</p> <p>3 A. Right.</p> <p>4 Q. Okay. Let's take a look at</p> <p>5 Exhibit-27, the big one, there's "C. Wesley</p> <p>6 Morgan."</p> <p>7 A. Can you give me the page?</p> <p>8 Q. Page 62. Sorry, I thought I said</p> <p>9 that out loud.</p> <p>10 Okay. In -- the images are of the</p> <p>11 tweet from Wesley Morgan.</p> <p>12 So QLisa77 tweeted, "#QAnon is not</p> <p>13 a cult. #Q is self-programming therapy to</p> <p>14 deprogram yourself out of the cult of</p> <p>15 mindless indoctrination through use of</p> <p>16 Socratic method. Q provides info then</p> <p>17 pushes: Researching, logical thought,</p> <p>18 altruism, and the constitution. These are</p> <p>19 never goals of a cult."</p> <p>20 To which Wesley Morgan responds,</p> <p>21 "You are 100 percent correct in your</p> <p>22 assessment of Q. We know the truth, and the</p> <p>23 truth will set us free. WWGIWGA."</p> <p>24 Do you see that?</p>	<p style="text-align: right;">Page 101</p> <p>1 with you, yes.</p> <p>2 Q. Okay. You'll notice that QLisa not</p> <p>3 only says that QAnon supports deprogramming,</p> <p>4 but also supports the Constitution, right?</p> <p>5 A. Yes, I do.</p> <p>6 Q. Okay. In your experience of</p> <p>7 reading social media tweets involving QAnon,</p> <p>8 would you agree with me that it's a common</p> <p>9 theme among supporters of QAnon that they</p> <p>10 support the Constitution?</p> <p>11 A. It shows up. I don't know about</p> <p>12 how common it is relative to other QAnon</p> <p>13 themes.</p> <p>14 Q. Okay. Are there QAnon tweets that</p> <p>15 you're familiar with where they say, "We</p> <p>16 don't support the Constitution"?</p> <p>17 A. Not directly in my knowledge.</p> <p>18 Q. In fact, Q in general -- the QAnon</p> <p>19 movement, in general is patriotic as it comes</p> <p>20 to the United States of America, correct?</p> <p>21 A. Not in my judgment.</p> <p>22 Q. Okay. What is your judgment?</p> <p>23 A. In my judgment, patriotism in Q</p> <p>24 version of it is very selective, and leaves</p>

<p style="text-align: right;">Page 102</p> <p>1 out a whole lot of what people normatively 2 think of as patriotism. 3 Q. Okay. I'll accept that. And my 4 question was, imprecise, so, I'll try to do a 5 better job. 6 Setting aside what patriotism is or 7 what norms of patriotism are, isn't it the 8 case that people using -- who are involved in 9 the QAnon movement use the language of 10 patriotism and the language of the 11 Constitution claiming they are supportive of 12 it, regardless of whether you think it's 13 consistent with our norms of what patriotism 14 is? 15 A. Yes, I agree with that. 16 Q. Okay. So, in other words, if you 17 say "I support the Constitution and #QAnon," 18 those two things often go together, correct? 19 A. Sometimes they go together. 20 Q. Including the Constitution in your 21 tweet where you say, "I support QAnon" would 22 not undercut -- so if you had, "I support the 23 Constitution #QAnon," to you, the "I support 24 the Constitution" sentence is consistent with</p>	<p style="text-align: right;">Page 104</p> <p>1 say, "I stand by the Constitution", "#QAnon" 2 doesn't undercut it. 3 And I'm asking you if saying, "I 4 stand by the Constitution" undercuts the 5 "#QAnon." 6 MR. BISS: Object to the form. 7 THE WITNESS: It -- it may or 8 may not, depending on what the 9 person -- what the -- the context 10 is. 11 BY MS. BOLGER: 12 Q. Okay. I have a lot of stuff going 13 on here. Sorry. 14 MS. BOLGER: I'm going to mark 15 as Exhibit-421, another series of 16 tweets published by Jack Flynn. 17 MR. BISS: I think that's 422. 18 MS. CHERNER: It's 422. 19 - - - 20 (Whereupon, Exhibit-422, 21 Tweets Published by Jack Flynn, Tab 22 48, was marked for identification.) 23 - - - 24</p>
<p style="text-align: right;">Page 103</p> <p>1 the "#QAnon," in other words, they're not in 2 conflict, right? 3 A. In the then diagrams of using the 4 word "Constitution" and "QAnon," I would not 5 say they're consistent because most of the 6 time when people use "Constitution," it's 7 outside of the context of QAnon. 8 But there is an overlap, I agree 9 with that, where people use both "QAnon" and 10 "Constitution." 11 Q. And to name -- to -- to use the 12 name "Constitution" in that context does not 13 necessarily mean that a person is disclaiming 14 QAnon, correct? 15 A. It does not necessarily mean that. 16 Q. Okay. And if you use "QAnon," it 17 doesn't necessarily mean you're disclaiming 18 the Constitution either? 19 A. "If you use QAnon, it doesn't 20 necessarily" -- 21 Q. If you say, "I stand by the 22 Constitution #QAnon" -- 23 A. Right. 24 Q. -- we've already agreed that if you</p>	<p style="text-align: right;">Page 105</p> <p>1 BY MS. BOLGER: 2 Q. Dr. Moskalenko, I happen to be 3 dyslexic, and the numbers of these exhibits 4 drives me crazy, so I'm very sorry I'm such a 5 mess. 6 A. Mm-humm. Don't worry -- 7 Q. I'm trying my best. 8 A. Please don't worry about it. 9 Q. So Tab 48, right? 10 A. (Witness complies.) 11 Yeah. 12 Q. So that's for you, and that's for 13 you. 14 Okay. So let's look at Tab -- 15 sorry, at Exhibit-422. 16 A. (Witness complies.) 17 Q. This is another printout, as I 18 mentioned of -- did I give you one with my 19 handwriting? I did. No. 20 A. Mm-humm. 21 Q. This is another printout of 22 Mr. Flynn's Twitter feed, and you'll see on 23 the very first page -- what does this banner 24 say?</p>

<p style="text-align: right;">Page 106</p> <p>1 A. "Trump Won"?</p> <p>2 Q. Yep. It's dated December 22nd,</p> <p>3 2020.</p> <p>4 A. Mm-humm.</p> <p>5 Q. And, then, you'll see in the second</p> <p>6 full tweets of the -- of the exhibit, it</p> <p>7 says, From Trumpress, who says, "We are" --</p> <p>8 "Beautiful. We are under attack. Patriots</p> <p>9 will answer the call to fight.</p> <p>10 #WWG1WGA WORLDWIDE."</p> <p>11 Do you see that?</p> <p>12 A. I do.</p> <p>13 Q. And that was one of the hashtags</p> <p>14 that was mentioned in Mr. Kaplan's article,</p> <p>15 right?</p> <p>16 A. It was.</p> <p>17 Q. All right.</p> <p>18 And, then, actually, if you go to</p> <p>19 Page 3 of 5 --</p> <p>20 A. (Witness complies.)</p> <p>21 Q. -- you'll see Mr. Flynn tweeted</p> <p>22 out, "#Trumpwon," right?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. You can put that aside.</p>	<p style="text-align: right;">Page 108</p> <p>1 - - -</p> <p>2 (Whereupon, Exhibit-423,</p> <p>3 Tweets by Sidney Powell, Tab 58,</p> <p>4 was marked for identification.)</p> <p>5 - - -</p> <p>6 BY MS. BOLGER:</p> <p>7 Q. Okay. I'm going to ask you to take</p> <p>8 a look at Exhibit-423, which is a series of</p> <p>9 tweets by Sidney Powell, and it's Tab 58.</p> <p>10 MS. BOLGER: Please tell me</p> <p>11 that was 423, was it?</p> <p>12 THE WITNESS: Yeah.</p> <p>13 BY MS. BOLGER:</p> <p>14 Q. And you'll see that this is a</p> <p>15 series of tweets that were tweeted out by</p> <p>16 Sidney Powell after the Flynn family tweeted</p> <p>17 out their oath on the 4th of July, and you</p> <p>18 will see that she holds herself out as doing</p> <p>19 it on their behalf.</p> <p>20 If you look at the second page of</p> <p>21 the exhibit --</p> <p>22 A. (Witness complies.)</p> <p>23 Q. -- you'll see that there's -- flip</p> <p>24 it one more over, sorry.</p>
<p style="text-align: right;">Page 107</p> <p>1 A. (Witness complies.)</p> <p>2 Q. I want to talk to you about the</p> <p>3 bell.</p> <p>4 What -- what do you know about the</p> <p>5 expression, "Where We Go One, We Go All"?</p> <p>6 A. It appears on the bell in the movie</p> <p>7 "White Squall." It has been kind of adopted</p> <p>8 by QAnon, and used prolifically with their</p> <p>9 content.</p> <p>10 Q. And you'll see in Exhibit-27, if</p> <p>11 you go back to Page 13 --</p> <p>12 A. (Witness complies.)</p> <p>13 Q. -- the -- among the reasons</p> <p>14 Alex Kaplan lists them -- and it's pretty</p> <p>15 much the only reason Alex Kaplan lists for</p> <p>16 including Tracy Lovvorn on his list of</p> <p>17 QAnon-sponsored contents is that she posted</p> <p>18 the QAnon slogan, along with a photo of a</p> <p>19 bell with the slogan on it.</p> <p>20 Do you see that?</p> <p>21 A. I do.</p> <p>22 Q. Okay. And you see the slogan, you</p> <p>23 see the bell, right?</p> <p>24 A. I do.</p>	<p style="text-align: right;">Page 109</p> <p>1 A. (Witness complies.)</p> <p>2 Q. -- you'll see there's a picture of</p> <p>3 the same bell, agreed?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And she says here, "The</p> <p>6 Flynn family -- #Flynn family and legal team</p> <p>7 appreciate the support in all forms we have</p> <p>8 received from countless #Patriots everywhere.</p> <p>9 The short phrase we recited at the end of the</p> <p>10 oath represents the sentiments expressed by</p> <p>11 John Dunn in "For Whom the Bell Tolls."</p> <p>12 And, then, there's a picture of the</p> <p>13 bell, correct?</p> <p>14 A. Correct.</p> <p>15 Q. Okay. Same picture?</p> <p>16 A. Yes.</p> <p>17 Q. Okay.</p> <p>18 MS. BOLGER: And can we do --</p> <p>19 can we put up on the screen the</p> <p>20 Complaint in the action, which is</p> <p>21 Tab 65. It may not be an exhibit.</p> <p>22 Page 13 of the Complaint.</p> <p>23 Can you make that a little</p> <p>24 bigger, Matt.</p>

<p style="text-align: right;">Page 110</p> <p>1 BY MS. BOLGER:</p> <p>2 Q. Okay. So this is from the</p> <p>3 Complaint alleged in this action, which has</p> <p>4 Jack Flynn tweeting out what's wrong with the</p> <p>5 statement, "Where We Go One, We Go All,"</p> <p>6 anyone. #Where We Go One, We Go All, or</p> <p>7 #WWG1WGA."</p> <p>8 And, then, you'll see the third</p> <p>9 tweet down says, "Anyone from a photo of</p> <p>10 Kennedy's brass deck bell" -- I can't read</p> <p>11 that, sorry -- "that shows" -- can you help</p> <p>12 me out -- so it says, "anyone have a photo of</p> <p>13 Kennedy's brass deck bell that shows this</p> <p>14 statement?"</p> <p>15 Do you see that?</p> <p>16 A. I do.</p> <p>17 Q. And that's this photo, right?</p> <p>18 A. What's "this photo"?</p> <p>19 Q. That he's calling for the</p> <p>20 re-publication of this photo, right?</p> <p>21 MR. BISS: Object to form.</p> <p>22 THE WITNESS: I don't know</p> <p>23 whether this is the photo he's</p> <p>24 calling for.</p>	<p style="text-align: right;">Page 112</p> <p>1 (Whereupon, Exhibit-424,</p> <p>2 PowerPoint Presentation, was marked</p> <p>3 for identification.)</p> <p>4 - - -</p> <p>5 THE CONCIERGE: This is Matt</p> <p>6 speaking.</p> <p>7 Did we want to mark the</p> <p>8 Complaint as an exhibit?</p> <p>9 MS. BOLGER: No. Don't worry</p> <p>10 about that one.</p> <p>11 THE CONCIERGE: Okay. Thank</p> <p>12 you.</p> <p>13 THE WITNESS: Can I say</p> <p>14 something?</p> <p>15 BY MS. BOLGER:</p> <p>16 Q. Of course you can.</p> <p>17 A. This is a PowerPoint that puts</p> <p>18 together several of -- of my slides, as well</p> <p>19 as not my slides. I think they may be Mia</p> <p>20 Bloom slides because she is one of the people</p> <p>21 listed here, and it's consistent with what I</p> <p>22 know of her.</p> <p>23 So I was part of this presentation,</p> <p>24 but I did not speak to all the slides in this</p>
<p style="text-align: right;">Page 111</p> <p>1 BY MS. BOLGER:</p> <p>2 Q. But there is a misconception in</p> <p>3 QAnon that this is from Kennedy's boat,</p> <p>4 correct?</p> <p>5 A. There is.</p> <p>6 Q. Okay. Okay.</p> <p>7 We talked a little bit about QAnon</p> <p>8 as an a la carte belief structure; is that a</p> <p>9 fair --</p> <p>10 A. That's a fair statement.</p> <p>11 Q. Okay. It's not an Orthodoxy,</p> <p>12 right?</p> <p>13 A. It is not.</p> <p>14 Q. Right.</p> <p>15 You don't have to believe in this,</p> <p>16 this, and this to be a Q, right?</p> <p>17 A. Correct.</p> <p>18 MS. BOLGER: Okay. We're</p> <p>19 going to take a look at Tab 11,</p> <p>20 which is going to be Exhibit-424,</p> <p>21 which is a PowerPoint presentation</p> <p>22 from a presentation given by</p> <p>23 Dr. Moskalenko.</p> <p>24 - - -</p>	<p style="text-align: right;">Page 113</p> <p>1 presentation.</p> <p>2 Does that make sense?</p> <p>3 Q. Sure.</p> <p>4 A. Okay.</p> <p>5 Q. Take a look at the second page,</p> <p>6 though.</p> <p>7 You'll see that there's two</p> <p>8 pictures of you there, right?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And if you look at the pages</p> <p>11 that says, "Our books."</p> <p>12 A. Yes.</p> <p>13 Q. At least two of those are yours,</p> <p>14 right -- three of them are yours -- four of</p> <p>15 them are yours?</p> <p>16 A. Four of them are mine.</p> <p>17 Q. Right.</p> <p>18 So -- so this is unquestionably a</p> <p>19 presentation that you were a part of putting</p> <p>20 together, correct?</p> <p>21 A. Correct. But as you see, there is</p> <p>22 a book by Arie Perliger. There's a book by</p> <p>23 Nelly Lahoud, and there is a book by</p> <p>24 Mia Bloom, several books by Mia Bloom and</p>

<p style="text-align: right;">Page 114</p> <p>1 John Horgan. 2 So, yes, I was a part of this 3 presentation, but it includes material that 4 is absolutely not my material, and I can't 5 speak to it. 6 Q. Okay. When you gave this 7 presentation, did you say at the beginning of 8 it, you know, "Some of this is not my 9 material, and I can't speak to it"? 10 A. No, I didn't because I didn't speak 11 to anybody else's material. I spoke to my 12 slides, and not to anybody else's slides. So 13 it was clear to anybody watching what I was 14 speaking to. 15 Q. If you look at -- it doesn't have 16 page numbers, which is a pain in the neck, so 17 the seventh slide, which has "QAnon 18 followers." 19 A. Yes. 20 Q. Okay. This is your slide, correct? 21 A. Yes. 22 Q. It says, "Followers for three top 23 QAnon-linked public Instagram accounts." 24 Do you see that?</p>	<p style="text-align: right;">Page 116</p> <p>1 Q. And "The Storm"? 2 A. Mm-humm. 3 Q. And those are ideas that people who 4 believe in Q believe? 5 A. Yes. 6 Q. Okay. And the next -- 7 A. I'm sorry. Some people believe 8 them, as we already discussed. 9 Q. Right. I'm sorry. 10 I should have been more precise. I 11 apologize. 12 On the next page it says, "QAnon 13 Candidates in 2020." 14 Is this your slide? 15 A. This is not. 16 Q. Okay. Is this Mia's? 17 A. This is Mia's. 18 Q. Okay. If you turn, now, so, one, 19 two, three, four, five pages from that you'll 20 find a slide that says, "But is QAnon a 21 Terrorist Group?" 22 Do you see that? 23 A. Yes. 24 Q. Okay. Is that your slide?</p>
<p style="text-align: right;">Page 115</p> <p>1 A. Yes. 2 Q. Okay. Were the names of the top 3 QAnon-linked public Instagram accounts 4 Qthewakeup, QAnon, #Obiwan, and WWG1WGA_? 5 A. Yes. 6 Q. Okay. And if you see at the top 7 QAnon-linked Instagram account in August of 8 2020 was WWG1WGA_? 9 A. Yes. 10 Q. Okay. Turn to the next page. 11 A. (Witness complies.) 12 Q. This is also your slide, right? 13 A. This is my slide. 14 Q. Okay. You often speak of 15 unfreezing, right? 16 A. Sometimes I do. 17 Q. Okay. And you'll see right in the 18 middle of Q -- 19 A. Yes. 20 Q. -- you'll see it says, #WWG1WGA, 21 right? 22 A. Yes, it does. 23 Q. And it also says, "Vaccine Poison"? 24 A. Yes.</p>	<p style="text-align: right;">Page 117</p> <p>1 A. It is my slide. 2 Q. Okay. You'll see there it has 3 a la carte ideology, right? 4 A. Yes. 5 Q. It says, "Too numerous to be 6 converted, and approximately 30 million hold 7 radical views," right? 8 A. Yes. 9 Q. Okay. And on the next page you 10 say, "QAnon, a Mental Health Emergency." 11 Is that your slide? 12 A. Yes. 13 Q. Okay. You'll see the blue it says, 14 "Case Studies of QAnon Followers." 15 A. Yes. 16 Q. Do you see that? 17 A. Yes. 18 Q. What is the criteria you used for 19 QAnon followers in that slide? 20 A. These are people who expressed 21 beliefs in QAnon conspiracy theories. This 22 is my data. 23 Q. Okay. Is that -- is this data from 24 the next -- related to the next five --</p>

<p style="text-align: right;">Page 118</p> <p>1 A. No. No.</p> <p>2 Q. Okay.</p> <p>3 A. Case studies are not the same as</p> <p>4 surveys. The next page is looking at survey</p> <p>5 data.</p> <p>6 Q. Okay.</p> <p>7 A. Different studies.</p> <p>8 Q. So what was the definition of QAnon</p> <p>9 followers that you used to put together this</p> <p>10 chart?</p> <p>11 A. Okay. So this survey did not ask</p> <p>12 participants.</p> <p>13 Q. Sorry. This one?</p> <p>14 A. So -- oh, oh. These were -- these</p> <p>15 included two kinds of data. One is</p> <p>16 interviews that I conducted with people who</p> <p>17 believe in QAnon conspiracy theories.</p> <p>18 And this --</p> <p>19 Q. That you found how -- not to</p> <p>20 interrupt you.</p> <p>21 A. -- is snowball sampling from</p> <p>22 several personal friends and religious groups</p> <p>23 contacts.</p> <p>24 Q. Okay. So you found these people</p>	<p style="text-align: right;">Page 120</p> <p>1 in these case studies, correct?</p> <p>2 A. These are different selection</p> <p>3 criteria. I could not use the data -- the</p> <p>4 kinds of data for Jack and Leslie Flynn to</p> <p>5 put them together into t his -- into this</p> <p>6 study.</p> <p>7 I would have to design a different</p> <p>8 sample with the same kind of materials, like</p> <p>9 depositions and collections of tweets and</p> <p>10 re-tweets and the things that are available</p> <p>11 to me for this trial in order to make</p> <p>12 judgments for this new sample.</p> <p>13 Q. And you did not do that, right, for</p> <p>14 the purposes of this report?</p> <p>15 A. I did not run a study of comparable</p> <p>16 people, I didn't.</p> <p>17 Q. Okay. And you didn't do a -- a</p> <p>18 survey of the Flynns in any way, right?</p> <p>19 A. No.</p> <p>20 Q. Okay. If you look at the next</p> <p>21 page, these are also your slides, right?</p> <p>22 A. One -- I see one slide. What are</p> <p>23 you looking at?</p> <p>24 Q. I'm sorry. Flip one more over.</p>
<p style="text-align: right;">Page 119</p> <p>1 through the real world rather than the cyber</p> <p>2 world?</p> <p>3 A. Correct.</p> <p>4 Q. Okay. Sorry.</p> <p>5 And the second group?</p> <p>6 A. And the second group was cases of</p> <p>7 people who came out as having been QAnon</p> <p>8 believers, or still being new QAnon believers</p> <p>9 and gave extensive interviews to the media,</p> <p>10 and some of these people are cited in the</p> <p>11 book, like Melissa Ray Lively, and a guy</p> <p>12 whose name I can't pronounce who, you know,</p> <p>13 became disillusioned in QAnon, and, then,</p> <p>14 became an outspoken advocate against it.</p> <p>15 So those people who had a lot of</p> <p>16 interview materials available to me, videos,</p> <p>17 or interviews to, like, Washington Post, or</p> <p>18 to The New Yorker was enough data to make a</p> <p>19 judgment. I selected them into the group of</p> <p>20 case studies.</p> <p>21 Q. Okay. And you would not have -- as</p> <p>22 you sit here, you do not have enough data on</p> <p>23 either Jack Flynn or Leslie Flynn or</p> <p>24 Valerie Flynn or Lori Flynn to include them</p>	<p style="text-align: right;">Page 121</p> <p>1 A. (Witness complies.)</p> <p>2 Q. Other way.</p> <p>3 A. (Witness complies.)</p> <p>4 Q. It's a really confusing document, I</p> <p>5 apologize.</p> <p>6 A. These are my slides yes.</p> <p>7 Q. Okay. And I have heard you talk</p> <p>8 about these slides, and I don't need to show</p> <p>9 you the second part, but you say, "Do you</p> <p>10 have a loved one who believes in conspiracy</p> <p>11 theories?"</p> <p>12 Was that the question, conspiracy</p> <p>13 theories, or did you ask about QAnon?</p> <p>14 A. Okay. I -- I don't want to lie. I</p> <p>15 don't remember what the questionnaire</p> <p>16 actually asked. It could be either one. I</p> <p>17 don't know right now.</p> <p>18 Q. Okay. Okay.</p> <p>19 Then you can flip -- flip to -- I</p> <p>20 think it's 8 -- 8 down, you'll see there's a</p> <p>21 flag that says, "Where We Go One, We Go All."</p> <p>22 A. Yes.</p> <p>23 Q. And the slide reads, "There's an</p> <p>24 overlap between QAnon, anti Max, anti Vaxers,</p>

<p style="text-align: right;">Page 122</p> <p>1 anti 5G, Open Protests, "Stop the Steal" & 2 Right-Wing extremist groups who participated 3 in J6. QAnon beliefs are held at same time 4 with other adjacent conspiracy beliefs about 5 government overreach." 6 Is that your slide? 7 A. No. 8 Q. Whose slide is that? 9 A. I'm not sure. Not mine. 10 Q. Do you disagree with it? 11 A. I don't. 12 Q. The next slide is Jacob Chansley. 13 And, then, we go one, two, three, four, and 14 we get to the image of the Flynn family that 15 says, "Michael Flynn posts video featuring 16 QAnon slogan." 17 Do you see that? 18 A. I do. 19 Q. Is this your slide? 20 A. No, it's not. 21 Q. How was it used in the 22 presentation? 23 A. I don't remember. 24 Q. Did you ever have any conversations</p>	<p style="text-align: right;">Page 124</p> <p>1 inclusion of this slide in a PowerPoint about 2 QAnon? 3 A. No. 4 Q. Why not? 5 A. Why would I? 6 Q. Just wondering. 7 A. The caption is accurate. 8 Michael Flynn did post a video 9 featuring a QAnon slogan. 10 Why would I object to that? 11 Q. Jack Flynn did, too, didn't he? 12 A. That's not what you're asking 13 about. 14 Q. I know. I'm asking you now. 15 Didn't Jack Flynn do the same 16 thing? 17 A. He did, but this is not the 18 presentation. 19 Q. Right. Okay. 20 You can put that aside. 21 A. I can put this away? 22 Q. Yeah. 23 A. (Witness complies.) 24 MS. BOLGER: Let's take just a</p>
<p style="text-align: right;">Page 123</p> <p>1 with -- is this Mia Bloom's slide? 2 A. I believe it is. 3 Q. All right. 4 And she's your co-author, right? 5 A. She is. 6 Q. In many, many ways? 7 A. In some ways, I've had -- I've had 8 some more prolific authorships, but in some 9 ways. 10 Q. Okay. But you've been on a lot of 11 panels together and podcasts together and 12 you've done a lot of things together in 13 promoting "Pastels and Pedophiles," right? 14 A. We've done some things, yes. 15 Q. Well, I guess I've watch a lot. 16 A. I'm sorry. So sorry. 17 Q. I'll go with between, like, 10 to 18 20, maybe? 19 A. Sounds fair. 20 Q. Okay. Did you ever tell 21 Ms. Bloom -- Dr. Bloom that you didn't want 22 her to use this slide? 23 A. No. 24 Q. Okay. Do you object to the</p>	<p style="text-align: right;">Page 125</p> <p>1 five-minute break, or -- or we can 2 go have lunch, depending on how you 3 guys want to do this, but I need to 4 organize paper, so let's take a 5 break. 6 THE VIDEOGRAPHER: The time is 7 12:18. We are going off the video 8 record. This ends Media Unit 9 Number 2. 10 - - - 11 (Whereupon, there was a brief 12 recess held off the video record.) 13 - - - 14 THE VIDEOGRAPHER: Stand by. 15 The time is 1:00 o'clock. We are 16 going back on the video record. 17 This begins Media Unit Number 3. 18 - - - 19 (Back on the video record.) 20 - - - 21 BY MS. BOLGER: 22 Q. Great. 23 If you look at Page 12 of your 24 report --</p>

<p style="text-align: right;">Page 126</p> <p>1 A. (Witness complies.)</p> <p>2 Q. -- the second paragraph reads, "The</p> <p>3 words, 'Where We Go One, We Go All,' make no</p> <p>4 reference to QAnon or to any of</p> <p>5 QAnon-associated beliefs.</p> <p>6 "It is therefore possible for</p> <p>7 anyone to recite these words without making</p> <p>8 reference to QAnon or QAnon beliefs simply</p> <p>9 for their appeal as a catchy" phase-- "phrase</p> <p>10 with a nice ring to it, and to call" -- "and</p> <p>11 call its unity and mutual support.</p> <p>12 "In the absence of any evidence</p> <p>13 that the Flynn believed QAnon conspiracy</p> <p>14 theories at the time when they recited the</p> <p>15 phrase, there is no basis to contribute the</p> <p>16 recitation of their support of QAnon."</p> <p>17 Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Are you saying that that the</p> <p>20 phrase, "Where We Go One, We Go All," has</p> <p>21 some meaning in existence other than being</p> <p>22 associated with QAnon?</p> <p>23 A. It has an internal meaning.</p> <p>24 Q. To a person?</p>	<p style="text-align: right;">Page 128</p> <p>1 Scottish independence.</p> <p>2 Q. What's his name?</p> <p>3 A. I don't remember. But if you use</p> <p>4 the search term in quotation marks, you will</p> <p>5 see it.</p> <p>6 Q. In 2023.</p> <p>7 What about in 2021?</p> <p>8 A. I didn't look at dates. I just</p> <p>9 looked at the use of the phrase. There's a</p> <p>10 Serbian person who is tweeting about a</p> <p>11 family -- a -- a -- a short video, what looks</p> <p>12 like a brother and sister expressing</p> <p>13 affection to each other, and uses that phrase</p> <p>14 to -- they then subsequent tweets explain to</p> <p>15 denote family and unity and like that.</p> <p>16 Q. When did you do this search?</p> <p>17 A. Last night.</p> <p>18 Q. In preparing for this deposition?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Before last night where you</p> <p>21 decided to try to find another meaning for</p> <p>22 "Where We Go One, We Go All" --</p> <p>23 MR. BISS: Objection to the</p> <p>24 form.</p>
<p style="text-align: right;">Page 127</p> <p>1 A. Independent of QAnon.</p> <p>2 Q. To a person?</p> <p>3 A. To any person, yes. It has an</p> <p>4 internal meaning.</p> <p>5 Q. What is your basis for saying, "It</p> <p>6 has an internal meaning"?</p> <p>7 A. As a human being who uses language,</p> <p>8 I see meaning in it. That's my basis.</p> <p>9 Q. Other than your personal belief</p> <p>10 that "Where We Go One, We Go All" has</p> <p>11 personal ramifications, are you aware of the</p> <p>12 use of the phrase, "Where We Go One, We Go</p> <p>13 All," in anyplace else in the world, other</p> <p>14 than the movie, "White Squall," Q-drops, and</p> <p>15 in the QAnon movement?</p> <p>16 A. Yes, I do.</p> <p>17 Q. And what's that?</p> <p>18 A. If you search for this phrase</p> <p>19 in paren- -- in quotation marks on Twitter,</p> <p>20 you will find numerous instances of people</p> <p>21 using it completely unrelated to QAnon.</p> <p>22 There is a person who is tweeting</p> <p>23 about independence for Scotland on Twitter,</p> <p>24 who is using it to express his support for</p>	<p style="text-align: right;">Page 129</p> <p>1 BY MS. BOLGER:</p> <p>2 Q. -- were you ever aware of it being</p> <p>3 used ever in the history of the world for</p> <p>4 anything other than "White Squall" and QAnon?</p> <p>5 A. I did not contemplate that question</p> <p>6 until then.</p> <p>7 Q. That doesn't matter.</p> <p>8 Have you ever -- were you ever</p> <p>9 aware -- whether you contemplated it or not,</p> <p>10 were you ever aware prior to last night of</p> <p>11 the use of the phrase, "Where We Go One, We</p> <p>12 Go All," in any context other than "White</p> <p>13 Squall" or QAnon?</p> <p>14 A. I was not.</p> <p>15 Q. When Michael Flynn formed the video</p> <p>16 of his family saying the words, "Where We Go</p> <p>17 One, We Go All," on June 5th -- July 5th. He</p> <p>18 filmed it July 4th, and Jack Flynn posted it</p> <p>19 on July 5th, at that moment, are you aware of</p> <p>20 any meaning "Where We Go One, We Go All" had</p> <p>21 other than associated with QAnon?</p> <p>22 A. I'm sorry.</p> <p>23 Are you asking me about my opinion</p> <p>24 back then --</p>

<p style="text-align: right;">Page 130</p> <p>1 Q. Yes.</p> <p>2 A. -- of this phrase?</p> <p>3 Q. Yes. In July 2020, when --</p> <p>4 A. I didn't have an opinion then. I</p> <p>5 didn't have an opinion about the prevalence</p> <p>6 of this phrase's usage in versus out of</p> <p>7 QAnon.</p> <p>8 Q. That wasn't my question.</p> <p>9 My question was: Were you aware of</p> <p>10 any usage of it outside of QAnon, any usage?</p> <p>11 A. No.</p> <p>12 Q. How could it -- what other thing --</p> <p>13 sorry. I'll do that again.</p> <p>14 You're aware at the time that the</p> <p>15 Flynn's posted the video of the oath, there</p> <p>16 was a lot of press coverage about it, right?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And a lot of that press</p> <p>19 coverage, as we have already seen, remarked</p> <p>20 that General Flynn was using a QAnon slogan,</p> <p>21 correct?</p> <p>22 A. Correct.</p> <p>23 Q. And you were aware of all of that</p> <p>24 in July of 2020, correct?</p>	<p style="text-align: right;">Page 132</p> <p>1 "There's a great deal of</p> <p>2 speculation as to why President Trump refused</p> <p>3 to disavow the QAnon conspiracy during the</p> <p>4 2020 campaign. There are an additional set</p> <p>5 of allegations that QAnon supporters point to</p> <p>6 statements for President Trump that could</p> <p>7 possibly be a coincidence.</p> <p>8 "In one Q-drop, Q suggested that</p> <p>9 Trump would use the term, "Tip Top." And</p> <p>10 shortly thereafter, Trump appeared on the</p> <p>11 balcony of the Whitehouse with the First</p> <p>12 Lady Melania Trump -- Melania Trump and the</p> <p>13 Easter Bunny. Trump called the bunny "Tippy</p> <p>14 Top." For QAnon believers, this was proof.</p> <p>15 "The reason why people might</p> <p>16 suspect that General Flynn was involved with</p> <p>17 Q is because by 2019, most QAnon-related</p> <p>18 posts on the encrypted app Telegram, the</p> <p>19 right-wing social platform, Parler; on other</p> <p>20 sites, including a now disabled link to</p> <p>21 Flynn's legal defense fund. As Q often</p> <p>22 hinted, 'Follow the money.'</p> <p>23 "General himself -- "General Flynn</p> <p>24 himself pledged allegiance to QAnon on</p>
<p style="text-align: right;">Page 131</p> <p>1 A. I was aware of some of that.</p> <p>2 There's a lot of that.</p> <p>3 Q. Indeed, there was quite a lot of</p> <p>4 coverage about that use, the QAnon slogan,</p> <p>5 used by General Flynn on July 4th, right?</p> <p>6 A. There was -- yeah, a fair amount.</p> <p>7 Q. Did you disagree with it?</p> <p>8 MR. BISS: Objection to form.</p> <p>9 THE WITNESS: I didn't</p> <p>10 disagree or agree. I accepted it</p> <p>11 as a fact of journalistic</p> <p>12 reporting.</p> <p>13 BY MS. BOLGER:</p> <p>14 Q. Okay. Well, let's look at your</p> <p>15 book, Page 20 -- 21.</p> <p>16 A. (Witness complies.)</p> <p>17 Okay.</p> <p>18 Q. So there's a -- on Page, 20 there's</p> <p>19 a break, and the topic is, "Lieutenant</p> <p>20 General Michael Flynn. The fourth candidate</p> <p>21 for Q is that he is -- the fourth candidate</p> <p>22 for Q is that he is a high-level Whitehouse</p> <p>23 insider, like General Michael Flynn, or</p> <p>24 someone closely connected the him.</p>	<p style="text-align: right;">Page 133</p> <p>1 July 4, 2020, in which he added the phrase to</p> <p>2 the standard oath of office, "Where We Go</p> <p>3 One, We Go All."</p> <p>4 Flynn then posted the video to</p> <p>5 Facebook, Twitter, and other platforms</p> <p>6 ensuring that his oath of allegiance went</p> <p>7 viral. On General Flynn's website, he sold</p> <p>8 Q-branded items, T-shirts, and other</p> <p>9 merchandise, even before this material was</p> <p>10 banned from Etsy and Amazon." There's a</p> <p>11 typo.</p> <p>12 "Where We Go One, We Go All, this</p> <p>13 phrase is" asserted -- "is usually used as</p> <p>14 #acronym, #WWG1WGA. In QAnon mythology cited</p> <p>15 in Martin Geddes' writings, and their posts</p> <p>16 on social media, the phrase comes from an</p> <p>17 inspection on the bell on John F. Kennedy's</p> <p>18 sailboat. The boat, "Victura," is now part</p> <p>19 of the JFK library on the campus of UMASS</p> <p>20 Boston. There is no inscription on the bell;</p> <p>21 in fact, there is no bell. We checked. Nor</p> <p>22 is it on the Kennedy's family other boat, the</p> <p>23 "Honey Fitz." The phrase on the bell is a</p> <p>24 fabrication from the mind of Martin Geddes, a</p>

<p style="text-align: right;">Page 134</p> <p>1 British QAnon conspiracist. 2 This lie, like so much of QAnon 3 lore, was ripped from a Hollywood film, the 4 1996 movie, "White Squall," featuring 5 Jeff Bridges, in which there is a bell on 6 their boat with that very inscription. 7 The screenshot from the film is 8 widely circulated among the QAnon supporters' 9 evidence of JFK's connection to Q." 10 Do you see that? 11 A. Yes. 12 Q. Okay. So you and Ms. -- Dr. Bloom 13 wrote, "General Flynn himself pledged 14 allegiance to QAnon on July 4, 2020, in which 15 he added the phrase to the standard oath of 16 office, 'Where We Go One, We Go All.'" 17 Do you see that? 18 A. I do. 19 Q. Okay. How can you have confidence 20 in saying that General Flynn pledged 21 allegiance to QAnon, but you're not 22 comfortable saying it about any of the other 23 Flynns? 24 A. Now, first of all, there is a</p>	<p style="text-align: right;">Page 136</p> <p>1 It's really unprofessional. 2 MS. BOLGER: She can answer 3 the question. 4 MR. BISS: No, you can't. 5 She's not going to answer that 6 question. 7 THE WITNESS: Is your -- what 8 is your question? 9 BY MS. BOLGER: 10 Q. My question is: Is the reason why 11 you decided to re-read Mr. Sommer's article 12 was that you were trying to seek a way to 13 somehow distinguish Jack Flynn from 14 General Flynn? 15 MR. BISS: Grow up, Kate. 16 THE WITNESS: Okay. I don't 17 need to do that. They are two 18 separate people, and it's very 19 clear in my mind, and there's no 20 need for supporting evidence. Two 21 different people have the -- 22 BY MS. BOLGER: 23 Q. Is that a "yes" or "no"? 24 A. I did not do that --</p>
<p style="text-align: right;">Page 135</p> <p>1 reference at the end of that statement on 2 Page 21, so the reason we're confident is 3 we're citing somebody who presumably did the 4 work of ascertaining the facts that we recite 5 here are accurate. And that -- 6 Q. I think that's incorrect, but we'll 7 look. 8 A. Right. It's by Will Sommer in The 9 Daily Beast. 10 Q. Right. 11 But that article is not about -- 12 that article is about the selling of 13 merchandise, correct? 14 A. It does reference the reci- -- 15 recitation in the video. 16 Q. Are you sure? 17 A. Yeah. I looked it up. 18 Q. When did you look it up? 19 A. In preparation for trying to 20 remember. 21 Q. Trying to figure out a way to 22 distinguish between Jack and General Flynn? 23 MR. BISS: Kate -- Kate, 24 why -- why are you doing that?</p>	<p style="text-align: right;">Page 137</p> <p>1 Q. Why not? 2 A. -- because I don't need to do that. 3 Q. When did you look at it? 4 A. In preparation for, I think, the 5 first report. 6 Q. Okay. And that was the first time 7 you'd read it since read the book -- wrote 8 the book? 9 A. It was the first time I read what? 10 Q. The Will Sommer's article since you 11 wrote the book. 12 A. Maybe. I'm not sure. It's been 13 three years, so I might have used it 14 somewhere else since then. 15 Q. Okay. So tell me, again, how 16 you're planning to say that when 17 General Flynn says that it's a pledge 18 allegiance to QAnon, but when Jack says it 19 it's not? 20 A. Will Sommer helps me. He says it 21 in his... 22 Q. I'm talking about you. 23 A. I'm citing Will Sommer. 24 Q. Are you saying -- you are saying</p>

<p style="text-align: right;">Page 138</p> <p>1 General Flynn himself pledged allegiance to 2 QAnon on July 4, 2020, in which he added the 3 phrase to the standard oath of office, "Where 4 We Go One, We Go All." 5 A. Right. 6 Q. Okay. It's exactly what Mr. -- 7 what Jack Flynn said -- 8 A. Okay. 9 Q. And here you say, "There is no 10 basis to attribute their recitation of it to 11 their support of QAnon." 12 And I'm asking you, you -- 13 A. Yes. 14 Q. -- not Will Sommer -- how do you 15 distinguish between what you wrote in your 16 book and what you wrote in your report about 17 exactly the same action? 18 A. Okay. There are two things that I 19 need to say in answering your question: 20 One is that it is important that I 21 cite Will Sommer because I rely on 22 authenticity of his reporting because I 23 respect his work. He's a reputable 24 journalist. And at the time of the</p>	<p style="text-align: right;">Page 140</p> <p>1 understand intentions behind an action, and 2 it really helps to understand, if we can, 3 what beliefs precipitated that action. 4 There was enough information, I 5 thought, even in Sommer's report on 6 General Flynn in terms of benefiting from 7 QAnon movement and engaging with it to give 8 me confidence that the recitation of the 9 phrase had something to do with QAnon belief 10 system or, you know, pledging -- pledging 11 allegiance lean to it or whatever. 12 There is no parallel evidence in 13 the material I reviewed for writing the 14 reports and being here today about Jack and 15 Leslie Flynn. 16 Q. We just spent some of the morning 17 going through some of the thousands of tweets 18 in which Jack Flynn references QAnon. I can 19 do it all afternoon, Dr. -- Dr. Moskalenko -- 20 sorry, Dr. Moskalenko. I could do it all 21 afternoon. 22 Why is it that the things you saw 23 today don't change your mind? Aren't they 24 the context you're looking for, for</p>
<p style="text-align: right;">Page 139</p> <p>1 preparation of his book, journalistic 2 accounts from QAnon were the primary source 3 of data for us to rely on. There was no way 4 for me to get any kinds of materials that 5 were provided in this -- in this case, or any 6 other scientific material. 7 So journalistic accounts were what 8 were relied on believing that people who put 9 them together stand behind their words 10 through making sure that they're supported by 11 evidence. 12 Now, the second part is that two 13 people can do exactly the same thing for very 14 different reasons. I don't think it's a -- 15 it's something to be argued over, you know. 16 Somebody cuts somebody's leg off, maybe 17 because they're a surgeon and the person has 18 cancer and somebody else does it because 19 they're a torturer engaging in horrific 20 things. They do the same things for very 21 different reasons. 22 People can be doing the same thing 23 in the same room for very different reasons. 24 For that reason one needs context to</p>	<p style="text-align: right;">Page 141</p> <p>1 General Flynn? 2 He tweets a lot about QAnon. He 3 raises money out of QAnon. He posts himself 4 taking an oath. 5 Why are these things not enough for 6 Jack Flynn? 7 A. Okay. First of all, the things 8 that we looked over a lot of times cite the 9 use of the same phrase that we're arguing 10 over. The -- you showed me a lot of tweets 11 of Jack Flynn where we have a "#Where We Go 12 One, We Go All." 13 Q. Some of them did. 14 A. Right. So if, in fact, at the time 15 of reciting these words on camera, Jack Flynn 16 did not have the same understanding of them 17 as QAnon does, then his use of these same 18 words or #s in other places, it follows, 19 would also be guided by something other than 20 promoting QAnon. And that's where I am with 21 my understanding. 22 Q. When a human being who read those 23 words and saw those hashtags, read them, do 24 you really think that a reader thought, "Oh,</p>

<p style="text-align: right;">Page 142</p> <p>1 I'm not sure he supports Q. He's just using 2 that Q phrase, but maybe he's using it 3 differently." 4 Is that how you think that a reader 5 would read that? 6 MR. BISS: Object to the form. 7 THE WITNESS: I don't know 8 what "a reader" -- I mean, there's 9 no such thing as "a reader." 10 Everybody thinks whatever they 11 think based on, you know, their 12 genetics, upbringing, the 13 situation, personality, and so on, 14 so I don't know what anybody would 15 think. 16 I can tell you what I think. 17 I actually don't pay attention to 18 hashtags. I don't read them. So, 19 you know, I don't look at them when 20 I look at tweets personally. 21 BY MS. BOLGER: 22 Q. Well, I will -- what -- what is the 23 conduct of General Flynn that you think made 24 him saying, "The QAnon oath," and you calling</p>	<p style="text-align: right;">Page 144</p> <p>1 sufficient to make the inference that 2 Will Sommer did, that referenced here. 3 I did not see the same picture for 4 Jack Flynn when I read the material for this 5 case. 6 Q. What you lacking for Jack Flynn 7 that you had with Michael Flynn? 8 You said there was some speculation 9 that he was Q. You said he leveraged it for 10 financial gain. 11 What else? 12 A. I don't remember. I'd have to look 13 back over the referenced materials here. 14 Q. Well, he sold Q clothing, right? 15 A. That's what -- that's what 16 Will Sommer said, yeah. 17 Q. Right. 18 And he believed in the deep state, 19 right? 20 A. I -- I'm not ready to agree with 21 that, because I don't remember whether he 22 did. I'm -- I'm not familiar enough with 23 General Flynn's beliefs and activity, I am 24 not, so please don't expect me to.</p>
<p style="text-align: right;">Page 143</p> <p>1 it "a QAnon oath" is different from the 2 conduct of Jack Flynn doing exactly the same 3 thing, and you reaching the opposite 4 conclusion? 5 A. The journalistic accounts about 6 General Flynn, some of which are referenced 7 in this section that you just cited -- 8 there's more than that one by Will Sommer -- 9 included speculation that he was Q, included 10 speculation that he leveraged QAnon for 11 financial gain, and maybe was somehow, you 12 know, engaged with driving up support for 13 QAnon in order to drive up donations. 14 That is not the same as to say he 15 was or is a QAnon follower, which we didn't 16 say here. Different things, right? So 17 somebody can be -- 18 Q. I didn't ask you that. I asked 19 you -- what the difference was -- 20 A. No, no, no. I'm still -- I'm still 21 answering your question. 22 So in my reading of those 23 journalistic accounts of General Flynn, they 24 were convincing that the context was</p>	<p style="text-align: right;">Page 145</p> <p>1 Q. Well, you told me that the 2 difference between -- 3 A. Yes, and I -- 4 Q. I'm talking -- I'm talking. 5 A. Yes. 6 Q. You told me that the difference 7 between General Flynn and Jack Flynn was what 8 General Flynn did. And the only things that 9 you've given me examples are, are that other 10 people thought he was Q., he made money off 11 of it. Those are the only two things you 12 told me make him different from Jack Flynn. 13 Is there anything else that you 14 think makes him different from Jack Flynn? 15 A. Probably. I don't remember. It's 16 been three years since I researched the book. 17 Q. But it hasn't been three years 18 since you wrote an opinion that there wasn't 19 enough information to attribute the 20 support of the -- that there wasn't enough -- 21 enough to attribute to Jack Flynn to say it 22 was a QAnon slogan. That wasn't three years 23 ago. That was recently. 24 What else would you have needed to</p>

<p style="text-align: right;">Page 146</p> <p>1 say the same thing about Jack Flynn that you</p> <p>2 said in a book about Michael Flynn doing</p> <p>3 exactly the same behavior?</p> <p>4 A. That -- no, I'm not saying the same</p> <p>5 thing about Jack Flynn as I said about</p> <p>6 General Flynn in the book. Nowhere in the</p> <p>7 book do I say that General Flynn is a QAnon</p> <p>8 follower --</p> <p>9 Q. You --</p> <p>10 A. -- or a believer in the QAnon</p> <p>11 conspiracy theories.</p> <p>12 Q. You say, "General Flynn himself</p> <p>13 pledged allegiance to QAnon on July 4th,</p> <p>14 2020" --</p> <p>15 A. Mm-humm.</p> <p>16 Q. -- "in which he added the phrase to</p> <p>17 the standard oath of office, 'Where We Go</p> <p>18 One, We Go All.' Flynn then posted the video</p> <p>19 to Facebook Twitter and other platforms</p> <p>20 ensuring that his oath of allegiance went</p> <p>21 viral."</p> <p>22 Jack Flynn did exactly the same</p> <p>23 thing, but you say there is no basis to</p> <p>24 attribute his recitation to it to their</p>	<p style="text-align: right;">Page 148</p> <p>1 that's just a gesticulation. I'll</p> <p>2 re-compose --</p> <p>3 MR. BISS: Then -- then stop</p> <p>4 that.</p> <p>5 BY MS. BOLGER:</p> <p>6 Q. You say, "There is no basis to</p> <p>7 attribute their recitation of it to their</p> <p>8 support of QAnon."</p> <p>9 That's what you said.</p> <p>10 MR. BISS: Let's --</p> <p>11 BY MS. BOLGER:</p> <p>12 Q. -- that's the opposite of --</p> <p>13 MR. BISS: Let's -- let's stop</p> <p>14 the gesticulation.</p> <p>15 BY MS. BOLGER:</p> <p>16 Q. -- Glenn -- "General Flynn himself</p> <p>17 pledged allegiance to QAnon on July 4, 2020,</p> <p>18 in which he added the phrase to the standard</p> <p>19 oath of office, 'Where We Go One, We Go All.'</p> <p>20 Flynn then posted the video to Facebook,</p> <p>21 Twitter, and other platforms ensuring that</p> <p>22 his oath of allegiance went viral."</p> <p>23 So in the book you say, "Posting</p> <p>24 the Pledge of Allegiance, repeating the</p>
<p style="text-align: right;">Page 147</p> <p>1 support of QAnon.</p> <p>2 MR. BISS: Object to the form.</p> <p>3 BY MS. BOLGER:</p> <p>4 Q. How are those two -- what is it</p> <p>5 about Jack Flynn that is different from</p> <p>6 General Flynn?</p> <p>7 A. Does it say anywhere in my book</p> <p>8 that General Flynn is a -- is a believer in</p> <p>9 QAnon conspiracy theories, or that he's a</p> <p>10 follower? And I --</p> <p>11 Q. I'm not comparing those two. I'm</p> <p>12 comparing this sentence.</p> <p>13 A. Yes, you are.</p> <p>14 Q. No, I'm comparing this sentence.</p> <p>15 There?</p> <p>16 A. Yeah.</p> <p>17 Q. "There is no basis to attribute</p> <p>18 their recitation of the phrase, 'Where We Go</p> <p>19 One, We Go All,' to their support of QAnon."</p> <p>20 That's your phrase. That's not --</p> <p>21 you've already told me your opinion is not</p> <p>22 about the report. You said --</p> <p>23 MR. BISS: Hey, Kate --</p> <p>24 MS. BOLGER: Sorry for the --</p>	<p style="text-align: right;">Page 149</p> <p>1 phrase, 'Where We Go One, We Go All,' and</p> <p>2 then posting it to ensure it goes viral is</p> <p>3 pledging allegiance to QAnon."</p> <p>4 But in your report you say, the</p> <p>5 exact behavior done by Jack Flynn -- it's</p> <p>6 exactly the same. He did exactly the same</p> <p>7 thing.</p> <p>8 You say, "There's no basis to</p> <p>9 attribute the recitation of it to their</p> <p>10 support of QAnon."</p> <p>11 How are they different?</p> <p>12 MR. BISS: Object to the form.</p> <p>13 Argumentative.</p> <p>14 THE WITNESS: Does it say in</p> <p>15 the book that I attribute these</p> <p>16 behaviors of General Flynn to his</p> <p>17 support of QAnon?</p> <p>18 BY MS. BOLGER:</p> <p>19 Q. Your book says, "General Flynn</p> <p>20 himself pledge allegiance to QAnon."</p> <p>21 A. Yep.</p> <p>22 Q. "Pledged allegiance" is generally</p> <p>23 perceived as supportive, yes?</p> <p>24 A. Not necessarily.</p>

<p style="text-align: right;">Page 150</p> <p>1 Q. Really? You pledge allegiance to 2 thing that you don't support? 3 A. Absolutely. I lived in the Soviet 4 Union until I was 18 years old. I pledged 5 alliance every morning to something. 6 Q. Well, that's not what you meant 7 here. 8 A. I don't -- 9 Q. "General Flynn himself pledged 10 allegiance to QAnon on July 4, 2020, in which 11 he added the phrase to the standard oath of 12 office, 'Where We Go One, We Go All.' Flynn 13 then posted the video to Facebook, Twitter, 14 and other platforms ensuring that his oath of 15 allegiance went viral." 16 MR. BISS: Kate -- 17 BY MS. BOLGER: 18 Q. But when Jack Flynn does it, he 19 says there is -- you say, "There's no basis 20 to attribute the recitation of their support 21 to QAnon." 22 And I want to know what the 23 difference is and you have not told me. 24 So what's the difference?</p>	<p style="text-align: right;">Page 152</p> <p>1 answering -- 2 MR. BISS: You're insulting -- 3 THE COURT REPORTER: I'm 4 sorry. I can't take two people at 5 the same time. 6 MR. BISS: I -- I know, 7 because she doesn't stop talking. 8 She's rude. 9 BY MS. BOLGER: 10 Q. You're -- you're -- you're 11 answering the question. 12 Was the backyard barbecue 13 recitation an oath to QAnon? 14 That's the question you're 15 answering. In this section, you're not 16 talking about QAnon following. 17 You're -- literally, the question 18 you have post -- and this is why I think you 19 just didn't remember where it was -- is, was 20 that the backyard barbecue recitation an oath 21 to QAnon? 22 And you say, "There is no basis to 23 attribute" -- "to attribute the recitation of 24 it to their support of QAnon."</p>
<p style="text-align: right;">Page 151</p> <p>1 MR. BISS: Object to the form. 2 THE WITNESS: You're drawing a 3 false parallel, and because it's a 4 false parallel I can't really 5 answer that question directly. 6 And the -- and the real 7 parallel would be if I said in the 8 book that Jack Flynn is either a 9 believer in QAnon conspiracy 10 theories or a follower of QAnon or 11 a supporter of QAnon, and I didn't. 12 BY MS. BOLGER: 13 Q. But that's not -- 14 A. That -- and that was the question I 15 was answering in regard to Jack and Leslie 16 Flynn. 17 Q. Okay. Take a look at your report, 18 because I think you must be confused. 19 Take a look at Page 12. 20 A. (Witness complies.) 21 MR. BISS: Kate, why don't 22 you -- 23 BY MS. BOLGER: 24 Q. You see the question you're</p>	<p style="text-align: right;">Page 153</p> <p>1 And I am saying that is 2 inconsistent with Page 20 where you describe 3 exactly the same behaviors as pledging 4 allegiance to QAnon. And I want to know what 5 the difference is and you have not told me. 6 MR. BISS: Object to the form. 7 Argumentative. Compound. 8 If you understand what the 9 question was in -- in the midst of 10 all of the speeches, go ahead and 11 answer it. 12 If you need clarity, ask her 13 for clarity. 14 THE WITNESS: The difference 15 is that two people can do exactly 16 the same thing, intending different 17 roles, and doing it for different 18 reasons. 19 And you're asking me about two 20 different people. One is 21 General Flynn, and -- sorry, three 22 different people. General Flynn 23 versus Jack and Leslie Flynn. 24 And I don't think it's</p>

<p style="text-align: right;">Page 154</p> <p>1 reasonable to draw conclusions from 2 what General Flynn did as to why, 3 or, you know, what was intended by 4 Jack or Leslie Flynn when they did 5 it. 6 BY MS. BOLGER: 7 Q. And I'm not asking you to. You're 8 exactly right. I agree with you. 9 There has to be something different 10 about Jack Flynn and General Flynn because 11 you've reached opposite conclusions about 12 both of them, and I'm asking you to tell me 13 what it is. 14 Why when Jack Flynn pledged 15 allegiance to QAnon, in which he added the 16 phrase to the standard oath of office, "Where 17 We Go One, We Go All," then posted the video 18 to Twitter and -- and other platforms 19 ensuring it went viral. 20 Jack Flynn did exactly that. When 21 he did it, you say, "There is no basis to 22 attribute the recitation of it to QAnon." 23 To General Flynn, you say, it made 24 him -- he pledged allegiance.</p>	<p style="text-align: right;">Page 156</p> <p>1 with your name on the cover you say: 2 "General Flynn himself pledged allegiance to 3 QAnon on July 4th, 2020, in which he added 4 the phrase to the standard oath of office, 5 'Where We Go One, We Go All.'" 6 Jack Flynn did exactly the same 7 thing factually, right? 8 MR. BISS: Object to the form. 9 THE WITNESS: I am not sure of 10 that. 11 BY MS. BOLGER: 12 Q. How could you not be sure of it? 13 It's a video of them doing exactly the same 14 thing. 15 A. They said the same words. 16 Whether -- when the -- I mean, when you're 17 saying that he did the same things factually, 18 it contains also an implication of intention. 19 If we're talking about pledging an 20 oath -- and I'm not sure that the intention 21 was identical. 22 Q. What are the -- you're our expert. 23 You have to have a basis for your opinion, 24 and the -- the basis of your opinion has to</p>
<p style="text-align: right;">Page 155</p> <p>1 Tell me what -- what about these 2 people makes them different? 3 A. Conclusions in the book were 4 reached not by me but by a journalistic who 5 is cited in the book. I then -- I then 6 referenced Will Sommer's report, who is 7 talking about General Flynn reciting the 8 QAnon oath. 9 I did not reach identical 10 conclusions because, as I said, the statement 11 that I cite Will Sommer for refers to the -- 12 the -- the -- the -- the actions of 13 General Flynn and not his beliefs, or to his 14 intentions when doing what he did at the -- 15 in the video. 16 Q. Is it -- do you agree with me that 17 Jack Flynn pledged allegiance to QAnon on 18 July 4th, 2020 when he added the phrase to 19 the standard oath of office, "Where We Go 20 One, We Go All"? 21 A. I'm sorry, can you repeat that. 22 Q. You -- in your book -- 23 A. Yes. 24 Q. -- in your book that you published</p>	<p style="text-align: right;">Page 157</p> <p>1 be something you can articulate to me. You 2 have not articulated to me what the 3 difference -- the factual difference is 4 between these two men that makes you think 5 one is pledging allegiance, and one is 6 totally not talking about QAnon. 7 What are -- what is the factual 8 basis of your opinion that these two men are 9 different? 10 A. I re- -- 11 MR. BISS: Object to form. 12 THE WITNESS: I relied on 13 Will Sommer's report in my -- in my 14 writing. No expert is ever 15 separated from facts obtained by 16 other people, and at the time of 17 writing the book journalistic 18 accounts were the only facts 19 available to me. 20 BY MS. BOLGER: 21 Q. Do you think it's wrong? 22 A. Which part? 23 MR. BISS: Object to the form. 24</p>

<p style="text-align: right;">Page 158</p> <p>1 BY MS. BOLGER:</p> <p>2 Q. The part in the book where you say,</p> <p>3 In -- in connection with every other</p> <p>4 organization -- news organization in the</p> <p>5 world -- and I would remind you, there's no</p> <p>6 footnote in this sentence. Your footnote</p> <p>7 relates to three sentences later.</p> <p>8 The sentence is, "General Flynn</p> <p>9 himself pledged allegiance to QAnon on July</p> <p>10 4, 2020, in which he added the phrase to the</p> <p>11 standard oath of office, 'Where We Go One, We</p> <p>12 Go All.'"</p> <p>13 No footnote there, right? That's</p> <p>14 your sentence that you wrote --</p> <p>15 A. Yes.</p> <p>16 Q. -- in keeping with all media</p> <p>17 outlets in the world at the time.</p> <p>18 What -- are you wrong? Is that</p> <p>19 wrong?</p> <p>20 A. Okay. The fact that the footnote</p> <p>21 is at the end of the paragraph does not mean</p> <p>22 that it's only referencing that sentence.</p> <p>23 It's okay to have a citation only once for</p> <p>24 several sentences in scientific and</p>	<p style="text-align: right;">Page 160</p> <p>1 Q. So, now, when someone buys this</p> <p>2 book, as I have bought many copies of it, and</p> <p>3 I read this, what in this copy is -- makes me</p> <p>4 think that you might want more data to</p> <p>5 triangulate that might change your idea about</p> <p>6 what General Flynn did?</p> <p>7 MR. BISS: Object to the form.</p> <p>8 THE WITNESS: Why would that</p> <p>9 be part of what you're supposed to</p> <p>10 have?</p> <p>11 BY MS. BOLGER:</p> <p>12 Q. Well, you don't, right? Anybody</p> <p>13 who picks up a book and reads it reads the</p> <p>14 book?</p> <p>15 A. Yes.</p> <p>16 Q. Right.</p> <p>17 If an author wants to disavow or</p> <p>18 say something different than what they said</p> <p>19 in the book, then they say that publicly,</p> <p>20 right?</p> <p>21 A. Not necessarily. The -- the facts</p> <p>22 come in, and we change our views depending on</p> <p>23 new facts all the time, including in science,</p> <p>24 and, usually, what happens is you publish</p>
<p style="text-align: right;">Page 159</p> <p>1 nonfiction writing. And, in fact, that</p> <p>2 reference refers to the sentence as well, not</p> <p>3 just to the sentence where it's physically</p> <p>4 located.</p> <p>5 Q. Do you -- do you think this is now</p> <p>6 wrong? As you sit here under oath, in your</p> <p>7 expert opinion, do you think the book you</p> <p>8 published where you said, "General Flynn</p> <p>9 himself pledged allegiance to QAnon on</p> <p>10 July 4th 2020, in which he added the phrase</p> <p>11 to the standard oath of office, 'Where We Go</p> <p>12 One, We Go All'" was wrong?</p> <p>13 A. I don't know whether it's wrong.</p> <p>14 But if I were writing or re-publishing this</p> <p>15 book today, I would have a lot more</p> <p>16 information on which to base this opinion,</p> <p>17 and I would use that information to</p> <p>18 triangulate the very limited information I</p> <p>19 had in 2020.</p> <p>20 Q. So you don't think it's wrong?</p> <p>21 A. I don't know whether it's wrong,</p> <p>22 because I don't have that information,</p> <p>23 because I haven't looked at it, because I'm</p> <p>24 not opining on General Flynn.</p>	<p style="text-align: right;">Page 161</p> <p>1 more recent material that is updated with all</p> <p>2 the facts that you've accumulated since</p> <p>3 you've published the last material.</p> <p>4 And when people are interested in</p> <p>5 most up-to-date opinion of yours, they go to</p> <p>6 the most recent publication. And I have not</p> <p>7 yet --</p> <p>8 Q. I'm going -- I'm going to ask you</p> <p>9 one more time, and, hopefully, this time you</p> <p>10 can actually give me an answer.</p> <p>11 MR. BISS: Spare us the</p> <p>12 speeches.</p> <p>13 BY MS. BOLGER:</p> <p>14 Q. There is a --</p> <p>15 MR. BISS: Endless speeches.</p> <p>16 Oh, my God.</p> <p>17 BY MS. BOLGER:</p> <p>18 Q. On Page 12, you say that, "In the</p> <p>19 absence of any evidence" -- so you say,</p> <p>20 "There's no basis to believe to attribute the</p> <p>21 recitation of the QAnon oath by Jack Flynn to</p> <p>22 a support for QAnon."</p> <p>23 That is your opinion. Divorced</p> <p>24 from intent, divorced from belief, divorced</p>

<p style="text-align: right;">Page 162</p> <p>1 from anything else.</p> <p>2 On Page 12 of your report, you say,</p> <p>3 "Was the backyard barbecue recitation an oath</p> <p>4 to QAnon?" And you conclude it was not.</p> <p>5 On Page 20, you conclude that</p> <p>6 exactly the same oath, exactly the same</p> <p>7 actions, were pledging allegiance to QAnon.</p> <p>8 What is the piece of information</p> <p>9 that you have about Jack Flynn that makes</p> <p>10 exactly the same action different?</p> <p>11 MR. BISS: Object to the form.</p> <p>12 Argumentative.</p> <p>13 THE WITNESS: I have many</p> <p>14 piece of information for Jack Flynn</p> <p>15 that I didn't have for</p> <p>16 General Flynn --</p> <p>17 BY MS. BOLGER:</p> <p>18 Q. What are they?</p> <p>19 A. -- including his deposition where</p> <p>20 he was asked about why he followed</p> <p>21 General Flynn in -- in stating these -- these</p> <p>22 words and including his opinion on QAnon and</p> <p>23 his opinion on all these different beliefs.</p> <p>24 I also have information from his</p>	<p style="text-align: right;">Page 164</p> <p>1 BY MS. BOLGER:</p> <p>2 Q. And none of that evidence was</p> <p>3 available to you or anybody else in February</p> <p>4 of 2021, right?</p> <p>5 A. On -- I had no evidence on</p> <p>6 Jack Flynn in February of -- 2021, you said?</p> <p>7 Q. Yes.</p> <p>8 And, to the best of your knowledge,</p> <p>9 no one else did either?</p> <p>10 A. Yes.</p> <p>11 Q. Look at Page 93.</p> <p>12 A. (Witness complies.)</p> <p>13 Q. There's a final -- the -- the final</p> <p>14 paragraph is, "As a former employee of a</p> <p>15 pharmaceutical company and a recovering</p> <p>16 painkiller addict, Lauren Witzke experienced</p> <p>17 firsthand the depravity of bad scientists</p> <p>18 responsible for the opioid" -- epi -- "opioid</p> <p>19 crisis. Witzke supported anti-scientific</p> <p>20 Q-conspiracy theories, including the flat</p> <p>21 earth theory. On her social media, she</p> <p>22 repeatedly posted the QAnon pledge,</p> <p>23 'WWG1WGA,' 'Where We Go One, We Go All,' and</p> <p>24 was photographed wearing a Q-branded T- --</p>
<p style="text-align: right;">Page 163</p> <p>1 personal emails where he states his</p> <p>2 disassociation from QAnon. I also have his</p> <p>3 tweets where he expresses his lack of</p> <p>4 knowledge about QAnon, and solicits questions</p> <p>5 from the public to elucidate QAnon to him.</p> <p>6 So that is all the information --</p> <p>7 Q. So you're talking Jack Flynn's word</p> <p>8 for it?</p> <p>9 A. Yes, I do.</p> <p>10 Q. That's your evidence, Jack Flynn's</p> <p>11 word for it?</p> <p>12 A. On questions of belief, that is the</p> <p>13 evidence.</p> <p>14 Q. And all of that evidence you got in</p> <p>15 2023, right?</p> <p>16 A. On Jack Flynn?</p> <p>17 Q. Yeah.</p> <p>18 A. Absolutely.</p> <p>19 Q. Right.</p> <p>20 So none of that evidence was</p> <p>21 available to you, or, for that matter,</p> <p>22 anybody else in 2020, right?</p> <p>23 A. Correct.</p> <p>24 MR. BISS: Object to the form.</p>	<p style="text-align: right;">Page 165</p> <p>1 T-shirt."</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. So when she does it,</p> <p>5 "WWG1WGA," you call it a QAnon pledge.</p> <p>6 Why is it when Lizzy Witzke [sic]</p> <p>7 says, "WWG1WGA," it's a QAnon pledge, but</p> <p>8 when Jack Flynn does it, you're like, "No,</p> <p>9 no -- no connection to QAnon."</p> <p>10 A. It's Lauren Witzke, and you see</p> <p>11 that there is some context for making the</p> <p>12 attribution to her being -- do I say that</p> <p>13 she's a QAnon follower?</p> <p>14 Q. No, I said --</p> <p>15 A. She's --</p> <p>16 Q. That's not my question. I asked</p> <p>17 you specifically what she said.</p> <p>18 A. There's context for -- for her</p> <p>19 posting the "WWG1WGA" that includes her</p> <p>20 support for a number of QAnon conspiracy</p> <p>21 theories, and wearing QAnon-branded clothes.</p> <p>22 So it's more than just the pledge that drew</p> <p>23 the conclusion.</p> <p>24 Q. So what is it then? What were the</p>

<p style="text-align: right;">Page 166</p> <p>1 things that you made you draw that 2 conclusion? 3 A. I just said she supported a number 4 of QAnon conspiracy theories, including a 5 flat earth theory. She also was photographed 6 wearing a QAnon-branded T-shirt, and that's 7 just what's in here. 8 I'd have to look back at the 9 reference material to see what, if anything, 10 might be there in addition to what I chose to 11 retain for -- for the book. 12 Q. And is it your contention, as you 13 sit here, that Jack Flynn never expressed any 14 support for any QAnon theories? 15 A. I have not seen that evidence in 16 the materials provided to me. 17 Q. Do you feel like you've had an 18 encyclopedic review of everything that 19 Jack Flynn has ever said online? 20 A. I most certainly -- 21 MR. BISS: Object to the form. 22 THE WITNESS: -- do not. 23 I -- in fact, I stated that I 24 have not reviewed probably a vast</p>	<p style="text-align: right;">Page 168</p> <p>1 wasn't, right? You took his word for it. 2 And, two, you claim he hasn't ever 3 supported any -- publicly supported any QAnon 4 causes, right? 5 MR. BISS: Object to the form. 6 BY MS. BOLGER: 7 Q. Or QAnon theories, right? 8 MR. BISS: Mischaracterizes 9 the testimony. 10 THE WITNESS: That's not true. 11 I said different things than what 12 you -- 13 BY MS. BOLGER: 14 Q. Okay. I'm happy -- if I'm wrong, 15 I'm wrong. Correct me. 16 A. It's not about you being wrong. 17 It's just that my opinion was based on other 18 thing, including his statements in private 19 communications about distancing himself from 20 QAnon. 21 Q. Right. 22 So you're taking his word for it. 23 We did that one. 24 A. No.</p>
<p style="text-align: right;">Page 167</p> <p>1 majority of Jack Flynn's digital 2 footprint. I've only reviewed 3 exhibits that Mr. Biss provided to 4 me. 5 BY MS. BOLGER: 6 Q. But then -- but you feel 7 comfortable opining in the absence of that 8 information that he's not supporting QAnon? 9 You say here -- 10 A. Yes. 11 Q. -- that there is no basis to 12 attribute their recitation of the oath to 13 their support of QAnon? 14 A. Yes. 15 Q. But you've just told me you 16 don't -- you can't vouch for his entire 17 catalog of -- of speech, right? 18 A. I can only base my opinion on the 19 knowledge that I have before me. If new 20 facts come in, I then change my opinion. 21 That's all. 22 Q. So, so far, the only reason you 23 think that Jack Flynn hasn't been supportive 24 of QAnon is because, One, he tells you he</p>	<p style="text-align: right;">Page 169</p> <p>1 MR. BISS: No. 2 THE WITNESS: No, you're 3 mixing together his deposition and 4 his private emails. To me, those 5 are two very different kinds of 6 evidence, and each of them has a 7 distinct weight on my opinion. 8 BY MS. BOLGER: 9 Q. He is the speaker in both of them, 10 yes? 11 A. Yes. 12 Q. Okay. 13 A. To me, those are two distinct kinds 14 of evidence, and each has a separate weight. 15 Q. Okay. What -- other than -- other 16 than the things that Jack Flynn himself has 17 said, what are the things that you think mean 18 that you can conclusively say as an expert in 19 this litigation that there is no basis to 20 attribute Jack Flynn's recitation of the 21 QAnon to their support of QAnon? 22 A. I was asked to issue an expert 23 opinion on whether or not Jack Flynn believed 24 in the QAnon belief system, whether he</p>

<p style="text-align: right;">Page 170</p> <p>1 subscribed, whether he adhered to the QAnon 2 belief system. 3 On issues of belief, my primary 4 source of data, as is for social psychology 5 in general and social sciences, is the 6 person's statement. That's how we measure 7 beliefs. We ask people about them, or we 8 record their free utterances or -- yeah. 9 - - - 10 (Whereupon, Exhibit-425, Jack 11 Flynn's Series of Tweets, Tab 61, 12 was marked for identification.) 13 - - - 14 BY MS. BOLGER: 15 Q. I'm going to ask you to take a look 16 at Exhibits -- 425, which is Tab 61, which is 17 Jack Flynn's series of tweets. 18 A. (Witness complies.) 19 Q. I think I may have given one of you 20 guys my copy. I'm sorry if I did. 21 Take a look at the page of the 22 exhibit -- given the Page Number Page 2 of 7. 23 A. (Witness complies.) 24 Q. Okay. There's the Barbara Flynn --</p>	<p style="text-align: right;">Page 172</p> <p>1 interest in QAnon theories? 2 MR. BISS: Object to the form. 3 THE WITNESS: There is a lot 4 of interest in QAnon theories, 5 including my own, and I sometimes 6 re-tweet things. And you would 7 have to know me and why I might do 8 that to understand why I did that. 9 So I probably at some point 10 re-tweeted some QAnon conspiracy 11 theory because a lot of my 12 colleagues who study conspiracy 13 theories follow me, and I sometimes 14 want to alert them to some 15 interesting news related to their 16 work that is also related to my 17 work. 18 It does not mean that I 19 believe any of these theories or 20 support QAnon. 21 BY MS. BOLGER: 22 Q. Turn to the last page of the 23 exhibit. 24 A. (Witness complies.)</p>
<p style="text-align: right;">Page 171</p> <p>1 there's Jack Flynn re-tweeting his sister 2 taking the oath, right? And, then, below 3 that Jack Flynn re-tweets Barbara Flynn 4 saying, "The Obama/Clinton Cabal knew they 5 had to stop General Mike Flynn first, or they 6 would be all locked up now." 7 And it forwards a tweet from "Fake 8 News Crime Fighter," "The greatest 9 intelligence trap history has ever revealed." 10 Do you see that? 11 A. Yes. 12 Q. All right. 13 So Jack Flynn tweeted out, "The 14 Obama/Clinton Cabal knew they had to stop 15 General Mike Flynn first, or they would all 16 be locked up by now." 17 Do you see that? 18 A. I don't agree that he tweeted that. 19 He re-tweeted somebody else tweeting that. 20 Q. Okay. So it's something he chose 21 to put on his Twitter feed, right? 22 A. He re-tweeted, yes. 23 Q. Right. 24 And that is not to you repeating an</p>	<p style="text-align: right;">Page 173</p> <p>1 Q. All right. 2 So on the last page of the exhibit, 3 you'll see Jack Flynn re-tweeted, "Patriot 4 Transition Voice" with a meme that says, 5 "American Patriot," and there's a picture of 6 General Flynn. 7 And, then, underneath it it says, 8 "Where We Go One, We Go All," and, then, it 9 has two quotes from Q-drops. 10 Did you see this? 11 A. Do you mean on the black frame -- 12 Q. Yes. It says, "Same evidence to 13 free Flynn currently being used to indict 14 others, (Grand Jury)." Q-drop 4693. 15 "Who knows where the bodies are 16 buried." Q-drop. 17 Do you see that? 18 A. Yes. 19 Q. So just in this one stream of 20 Twitter, which is the one you saw, by the 21 way, in your report, you have Jack Flynn 22 re-tweeting someone saying, "Take The Oath" 23 and "Where We Go One, We Go All" on the 24 second page.</p>

<p style="text-align: right;">Page 174</p> <p>1 You have on the very first page him 2 asking for donations to the Mike Flynn 3 Defense Fund. Then you have him re-tweeting 4 Barbara Flynn and the Cabal, right? 5 And, then, you have "Obamagate." 6 That's on Page 4 of 7. That's a re-tweet of 7 the former president. 8 And, then, on Page 5 of 7, you, 9 again, have him re-tweeting someone taking 10 the oath. 11 And, then, you have a conspiracy 12 theory video about the attack on 13 September 11th. 14 And, then, you have 15 Sidney Powell -- well, she doesn't use any 16 terms. 17 Then you have Jack Flynn himself 18 tweeting that Hillary Clinton looks like 19 "nothing more than a" haggling -- "a nagging 20 of a loser." 21 And, then, you have Jack Flynn 22 tweeting out two Q-drops and the phrase, 23 "Where We Go One, We Go All." It's on one 24 Twitter feed. It's not the other things</p>	<p style="text-align: right;">Page 176</p> <p>1 explanation for why he would 2 re-tweet that -- that outside of 3 any QAnon-related matters. 4 And I recall from the 5 deposition of Jack Flynn that, I 6 believe, you asked him about a lot 7 of these tweets, and his 8 explanations are convincing that he 9 was re-tweeting support 10 for financial -- re-tweeting people 11 who donated. 12 There's one here or in one of 13 the previous exhibits. Somebody 14 donated, like, a fairly large sum, 15 like, hundreds of dollars. And he 16 was re-tweeting that. 17 He was re-tweeting pictures of 18 his brother. He was re-tweeting 19 his family members. 20 And people do that. And, you 21 know, sometimes the content is the 22 reason they re-tweet. Like, here's 23 a picture of his brother, "American 24 Patriot." And sometimes it's just</p>
<p style="text-align: right;">Page 175</p> <p>1 we've seen today. It's one completely 2 separate Twitter feed. 3 And I want you to repeat that you 4 can't be -- are you, in fact, comfortable 5 that Jack Flynn was not indicating support 6 for QAnon and its ideals when he re-tweeted 7 over and over and over again QAnon slogans, 8 QAnon hashes, and QAnon theories? 9 MR. BISS: Object to the form. 10 Argumentative. 11 THE WITNESS: I am struck in 12 particular by this last page, and 13 the tweet of the black frame. 14 And I want to submit to you 15 that putting this as evidence of 16 re-tweeting QAnon support is just 17 so strange, given that it's a 18 picture of his brother with a -- an 19 American flag in the background and 20 the huge words "American Patriot" 21 at the top. 22 And whatever else is on there 23 is besides the point because that 24 is, to my mind, enough of an</p>	<p style="text-align: right;">Page 177</p> <p>1 really support for the person. 2 Sometimes you re-tweet a 3 person to show them that you're 4 friendly to them. Re-tweeting 5 is -- is not necessarily indicative 6 of any kind of belief. 7 BY MS. BOLGER: 8 Q. And the only reason you perceive 9 that Jack Flynn did anything -- had any 10 reason in tweeting anything is because you 11 read his deposition transcript and believed 12 it, right? 13 A. No. I also looked at the tweets to 14 make sure it makes sense to me. And like I 15 said, this makes sense to me as him 16 re-tweeting a picture of his brother, the 17 American Patriot. 18 I don't even know if he read this, 19 or, if he did, that he understood, you know, 20 that he was re-tweeting QAnon Q-drops. 21 Q. Right. 22 You believe Mr. Flynn -- perfectly 23 fine. Everybody gets to believe whoever they 24 want.</p>

<p style="text-align: right;">Page 178</p> <p>1 But if a viewing audience looks at 2 a tweet, do you think the first thing they 3 think on a tweet is, "I just really believe 4 Mr. Flynn because I know all about his 5 allegiance to his brother, and, gosh, you 6 know, when he says, "Where We Go One, We Go 7 All," he obviously just means it about his 8 family. 9 Do you think that's how people 10 react to -- 11 MR. BISS: Stop pounding the 12 table. Stop pounding on the table. 13 MS. BOLGER: Stop dancing on 14 the table. 15 MR. BISS: You're just -- 16 you're -- you're -- you're engaged 17 in histrionics now. You're 18 excited -- 19 MS. BOLGER: Stop dancing on 20 the table. Stop screaming at me. 21 You need to chill out. 22 MR. BISS: You need to be calm 23 when you ask questions. 24 THE WITNESS: I'm sorry, I</p>	<p style="text-align: right;">Page 180</p> <p>1 clarifying for the record. 2 Q. Right. 3 A. Second, I am not just a viewer, and 4 I can't speak to what somebody else would 5 think. I can only speak to my opinion, as 6 you mentioned pejoratively, "expert opinion," 7 and that is what I am giving you here today. 8 I can't speak for the public. 9 Q. Right. 10 You cannot speak to the way a 11 reasonable reader would understand these 12 tweets, right? 13 A. I would think I'm a reasonable 14 reader, but that wasn't my job here. My job 15 was not to opine on the perception of people 16 with any kind of certainty attached to it. 17 My job was to opine on the beliefs and 18 intentions of the person posting. 19 Those are two very different 20 things, and you would be better off getting a 21 different expert to give you opinions on 22 perceptions. 23 That's not my area of expertise, 24 how people perceive tweets. There are people</p>
<p style="text-align: right;">Page 179</p> <p>1 actually forgot the question. 2 MR. BISS: So did I. 3 THE WITNESS: I had this a 4 tumultuous childhood. 5 BY MS. BOLGER: 6 Q. Do -- do you think in your expert 7 opinion as someone who is a sociologist -- 8 MR. BISS: You don't need to 9 be insulting, Kate, at all. That 10 is very unprofessional. 11 BY MS. BOLGER: 12 Q. -- that -- do you think in your 13 expert opinion, that is a person -- a person 14 who reads Twitter and reads, "WWGIWGA," looks 15 at that and thinks, "Gosh, he is just talking 16 about his brother"? 17 A. First of all, I am not a socialist. 18 Q. I know that, and I apologize. 19 A. I'm a psychologist. I've never 20 taken sociology in my life. 21 Q. I apologize. My sister-in-law is a 22 psych- -- is a sociologist. I -- I 23 apologize. 24 A. That's okay. No worries. I'm just</p>	<p style="text-align: right;">Page 181</p> <p>1 who do this work. 2 Q. Your expertise is, among other 3 things, to look into intentions and beliefs 4 and radicalization, and one of the tools you 5 use by doing that is by survey mechanisms, 6 right? 7 A. Right. 8 Q. And you didn't do any surveys here, 9 right? 10 A. Right. But it's just one of the 11 tools. 12 Q. What were the tools you used here? 13 A. I listed all of them at the 14 beginning of the deposition. 15 You want me to go over all of them 16 again? 17 Q. No. I'm asking you a more specific 18 question than in the beginning of the 19 deposition. 20 What were the specific tools that 21 you used in deciding that when Jack Flynn 22 posted, "Where We Go One, We Go All," that he 23 posted Q-drop, after Q-drop, after Q-drop, 24 that he -- after he posted "#TakeTheOath,"</p>

<p style="text-align: right;">Page 182</p> <p>1 "#TakeTheOath," and after he posted the video 2 of himself taking an oath to QAnon, what was 3 the tool that you used to make the expert 4 conclusion that he didn't believe any of it, 5 that he was just trying to say nice things 6 about his brother? 7 MR. BISS: Objection to form. 8 Argumentative. Compound. 9 THE WITNESS: In -- in 10 preparing my opinion, I used my 11 knowledge and practice in interview 12 methods and coding interviewing and 13 in compiling and analyzing case 14 studies, and in formulating and 15 assessing questions for all of 16 those methods, including survey 17 methods. 18 BY MR. BISS: 19 Q. But you didn't do an interview with 20 him? 21 A. No, but you did. 22 Q. No, I didn't. I took a deposition. 23 You didn't do an interview, right? 24 MR. BISS: Objection.</p>	<p style="text-align: right;">Page 184</p> <p>1 A. All datasets are very unlimited. 2 There's no complete dataset on a person's 3 belief or intentions. All data are limited. 4 Q. Your whole dataset is what Mr. Biss 5 gave you, right? 6 A. Correct. 7 Q. And, then, you said you formulated 8 questions, but you didn't ask any questions 9 of Mr. -- Mr. Flynn, right? 10 A. I didn't -- I'm sorry. I 11 formulated questions? 12 Q. You said one of your tools is to 13 formulate questions, and I'm asking if -- 14 A. And assess questions. 15 Q. Okay. Eith- -- either -- I thought 16 you said formulate. Assess is fine. 17 You never asked Mr. Flynn any 18 questions? 19 A. That's right. 20 Q. Okay. Did you know about the 21 #TakeTheOath movement? 22 A. I knew of it. 23 Q. When did you know of it? 24 A. Probably around the time that it</p>
<p style="text-align: right;">Page 183</p> <p>1 Argumentative. 2 BY MS. BOLGER: 3 Q. You -- you didn't code the 4 interview -- an interview that you did, 5 right? You didn't do a case study, right? 6 A. I kind of did. 7 Q. Where is it? 8 A. It's sitting in front of you. I am 9 giving you results of it in the reports that 10 I put together. 11 Q. That's all you -- that's all a case 12 study is you think it in your head, and you 13 write it down? 14 A. Yes. 15 MR. BISS: Objection. 16 Argumentative. 17 BY MS. BOLGER: 18 Q. You don't have data that's -- 19 A. Yes, I do. And I -- and I cite the 20 data that I used. And I used -- 21 Q. You told me that that dataset is 22 very limited. 23 It's only what Mr. Biss gave you, 24 right?</p>	<p style="text-align: right;">Page 185</p> <p>1 originated. 2 Q. What did you know about it? 3 A. That there was a -- a kind of fad 4 online with people tagging each other, and 5 inviting each other to follow them in saying 6 the words, including "Where We Go One, We Go 7 All," and that became known as the QAnon 8 oath, kind of like the water bucket challenge 9 was in years prior. 10 Q. And you're aware it came from a 11 Q-drop? 12 A. Yes. 13 Q. So you're aware that there was a 14 Q-drop that caused people to engage in this 15 #TakeTheOath movement and you're aware that 16 General Flynn and Jack Flynn independently 17 tweeted themselves taking the oath that were 18 in the words of the Q-drop with the 19 #TakeTheOath, right? 20 MR. BISS: Object to the form. 21 Argumentative. 22 THE WITNESS: I'm aware that 23 they posted the videos of 24 themselves.</p>

<p style="text-align: right;">Page 186</p> <p>1 BY MS. BOLGER:</p> <p>2 Q. With the #TakeTheOath?</p> <p>3 A. With the #TakeTheOath, I'm aware of</p> <p>4 that.</p> <p>5 Q. Okay. And in the case of Jack</p> <p>6 Flynn, it also had the #WWG1WGA, right?</p> <p>7 A. Yes.</p> <p>8 Q. Bearing in mind that you have</p> <p>9 concluded that there's no basis to attribute</p> <p>10 Jack Flynn's recitation of the oath to his</p> <p>11 support for QAnon, how can you justify --</p> <p>12 what do you do with the fact that it was</p> <p>13 called "Take The Oath," and he re-tweeted</p> <p>14 "Where We Go One, We Go All"?</p> <p>15 He was evidently taking part of the</p> <p>16 QAnon Take The Oath movement.</p> <p>17 How do you separate that out?</p> <p>18 MR. BISS: Object to the form.</p> <p>19 Argumentative.</p> <p>20 THE WITNESS: I don't have to</p> <p>21 separate it out. To me, it's not</p> <p>22 necessarily in. I don't -- I was</p> <p>23 looking for evidence of whether or</p> <p>24 not it was in, and the evidence I</p>	<p style="text-align: right;">Page 188</p> <p>1 He posted it on Twitter with the</p> <p>2 #TakeTheOath, right?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And he re-posted lots and</p> <p>5 lots and lots and lots and lots of other</p> <p>6 people with #TakeTheOath, right?</p> <p>7 MR. BISS: Object to the form.</p> <p>8 Argumentative.</p> <p>9 THE WITNESS: Probably.</p> <p>10 BY MS. BOLGER:</p> <p>11 Q. I mean, I can show them to you.</p> <p>12 A. Yes, probably. I believe you.</p> <p>13 Q. Okay. And, then, he tweets it</p> <p>14 himself as, "Where We Go One, We Go All,"</p> <p>15 right?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. So, if -- if -- what factor</p> <p>18 in that --</p> <p>19 A. Mm-humm.</p> <p>20 Q. -- could possibly lead you to</p> <p>21 conclude that it's anything other than</p> <p>22 joining a QAnon oath-taking moment?</p> <p>23 A. The factor is that I saw no</p> <p>24 evidence that Jack Flynn had familiarity with</p>
<p style="text-align: right;">Page 187</p> <p>1 saw was that at the same time as</p> <p>2 this fad was going around, and a</p> <p>3 lot of people who believed QAnon</p> <p>4 did these things, Jack Flynn did</p> <p>5 these same things. The question</p> <p>6 was whether he did it for the same</p> <p>7 reasons.</p> <p>8 That's what I've offered an</p> <p>9 opinion on, not that he didn't do</p> <p>10 the same thing. It's that the</p> <p>11 reason behind the thing might have</p> <p>12 been different. That's what I was</p> <p>13 looking for.</p> <p>14 BY MS. BOLGER:</p> <p>15 Q. So the Q-drop said an oath and</p> <p>16 said, "Take The Oath," right?</p> <p>17 A. Yes.</p> <p>18 Q. So, then, Jack Flynn testified that</p> <p>19 the things they said at the 4th of July</p> <p>20 barbecue were verbatim, what was in that</p> <p>21 Q-drop, right?</p> <p>22 A. I believe so. I don't remember.</p> <p>23 Q. Okay. So, then, he posted on</p> <p>24 QAnon -- sorry, Freudian slip.</p>	<p style="text-align: right;">Page 189</p> <p>1 QAnon or awareness of the referenced Q-drop</p> <p>2 or that at the time of this recitation that</p> <p>3 anybody who was present made it clear that</p> <p>4 what they were doing was supporting QAnon.</p> <p>5 And, instead, what he believed in</p> <p>6 his sworn deposition, that the oath was to</p> <p>7 the country and the statement, "Where We Go</p> <p>8 One, We Go All" was about the family. And,</p> <p>9 so, his posting of those things, to me,</p> <p>10 attested to his beliefs about them, which I</p> <p>11 just explained.</p> <p>12 Q. If a mem- -- if a human being were</p> <p>13 to look at his taking an oath, which he</p> <p>14 admits is directly from -- which he admits</p> <p>15 the words are the same as a Q-drop, posting</p> <p>16 it online with the words, "Take the oath,"</p> <p>17 along with every other member -- with many</p> <p>18 other people in QAnon, that it was</p> <p>19 accompanied by the #TakeTheOath, so that it</p> <p>20 would be searched by people in QAnon.</p> <p>21 If he then posted it more than</p> <p>22 once, once with "Take The Oath" and once</p> <p>23 with, "Where We Go One, We Go All," and a</p> <p>24 human being looked at that, is that not</p>

<p style="text-align: right;">Page 190</p> <p>1 signaling a connection to QAnon to a 2 reasonable reader. 3 MR. BISS: Object to the form. 4 Argumentative. 5 THE WITNESS: I am not here to 6 offer opinion on an -- I don't 7 know, a reasonable reader's 8 perception of this. 9 I am not prepared to offer the 10 opinion, because I would need to do 11 a lot of research on reasonable 12 people's perceptions of tweets and 13 re-tweets. And I am not familiar 14 with that literature and I don't 15 know that it exists, or how big it 16 is. 17 So I am not able to offer you 18 an opinion on that because it would 19 be just speculation. 20 BY MS. BOLGER: 21 Q. Your only basis for concluding that 22 when Jack Flynn tweeted out "Where We Go One, 23 We Go All," when Jack Flynn tweeted it 24 Q-drops, when Jack Flynn tweeted out memes</p>	<p style="text-align: right;">Page 192</p> <p>1 for any QAnon hashtags or anything 2 when there is a benefit to be 3 gained from re-tweeting a call for 4 donations for his brother's fund. 5 BY MS. BOLGER: 6 Q. What -- what -- what is the -- with 7 respect, because you're obviously brilliant, 8 what is the expertise that you just brought 9 to that calculus; isn't that just you 10 thinking it's good enough? 11 A. No. I actually have research to 12 back it up. 13 Q. Of Jack Flynn? 14 A. No, of research on attribution of 15 behavior. And when a person stands to gain 16 and -- and there are two different 17 interpretations, and one of them is the 18 person sets to gain something, and the other 19 is something esoterical, like belief, the 20 personal gain tends to be the explanation for 21 behavior. 22 Q. But that's Occam's razor again. 23 You're back to parsimony. You're back -- 24 you're back to saying, "I'm going to pick</p>
<p style="text-align: right;">Page 191</p> <p>1 that his -- his brother -- around the sign of 2 the great awakening, and when Jack Flynn took 3 an oath and posted it online as part of a 4 #TakeTheOath movement, when Jack Flynn sought 5 to sell merchandise that said, "Where We Go 6 One, We Go All" on it to make money for his 7 brother's defense fund, when -- all of that 8 is his public-facing Twitter and social media 9 behavior. 10 Your only expert opinion, as I get 11 it -- as I understand it right now, is not 12 what that looked like to the outside world or 13 what it meant, but what you upon reading the 14 documents that he gave you and self-selected 15 for you think he believed; is that right? 16 MR. BISS: Object to the form. 17 Compound and argumentative. 18 THE WITNESS: No. You -- 19 okay. So, first, you're lumping 20 together a lot of things. 21 For example, his support of 22 his brother's defense fund is 23 enough reason for him to re-tweet 24 anything. There is no need to look</p>	<p style="text-align: right;">Page 193</p> <p>1 which of one of these things are because it 2 makes more sense." 3 That's not a -- a fact, right? 4 That's your -- that's your theory of what you 5 think is more likely to happen. 6 A. It's -- it's supported also by 7 Jack Flynn testifying to that exact fact, 8 which is consistent with parsimony and only 9 adds to it. 10 Q. I -- I agree with you, that you are 11 absolutely parroting what Jack Flynn says. 12 Jack Flynn says he does it for his reason, 13 and you're saying he does it for the same 14 reason. 15 I'm asking you: Other than what 16 Jack Flynn has told you, is there anything 17 evidence that you can point to that, "Well, 18 Jack Flynn did that panoply of behavior that 19 we've been talking about for some of the day. 20 He was just doing it to support his brother?" 21 MR. BISS: Objection. Bad 22 form. Very, very bad form. 23 THE WITNESS: He was -- 24 MR. BISS: CNN-like bad form.</p>

<p style="text-align: right;">Page 194</p> <p>1 THE WITNESS: He was not just 2 doing that to support his brother. 3 Supporting his brother was one of 4 the reasons he was doing it. 5 Sometimes, like I said, he was 6 doing it to support his family. 7 Sometimes he was doing it to thank 8 people who donated. 9 Sometimes he was doing it to 10 re-tweet some other part of the 11 tweet, because tweets are not -- 12 you know, as somebody who knows how 13 to formulate questions, are not 14 just one thing. 15 They're double, triple 16 barreled. There are several things 17 together in one tweet, and you may 18 agree very strongly with one part 19 of the tweet and be neutral on the 20 second tweet and not care, or, you 21 know, have disagreement with the 22 last part of the tweet, and you'll 23 re-tweet it for the first part. 24 So it's not just supportive of</p>	<p style="text-align: right;">Page 196</p> <p>1 BY MS. BOLGER: 2 Q. Sure, he did. 3 A. Mr. Biss provided -- 4 Q. Mr. Biss is just his 5 representative. That's the way it works. 6 A. Okay. Some of the materials were 7 provided in your deposition with Jack Flynn. 8 So these those were questions you got to ask. 9 MR. BISS: Yeah, you provided 10 it, not me. 11 MS. BOLGER: 12 BY MS. BOLGER: 13 Q. I'm sure you know that there's a 14 difference between an interview and a 15 deposition because as you say, right, 16 interview questions, so, obviously, they're 17 not the same thing. 18 I'm asking about -- 19 MR. BISS: Deposition is 20 better. 21 BY MS. BOLGER: 22 Q. -- the only two things -- 23 MS. BOLGER: Actually, I 24 totally disagree.</p>
<p style="text-align: right;">Page 195</p> <p>1 his brother. It's a number of 2 different interpretations, but 3 they're not his belief in QAnon 4 belief system. 5 BY MS. BOLGER: 6 Q. So, again, I'm not actually asking 7 you what his belief is. I'm asking you: You 8 say in your report -- 9 A. Yes. 10 Q. -- right, that there is no basis to 11 attribute their recitation of the QAnon oath 12 to their support of QAnon. 13 You say in your book, that exactly 14 the same conduct by General Flynn is a pledge 15 of allegiance. And after all this time, I 16 think the only thing you are pointing to that 17 you say makes Jack different from 18 General Flynn is that -- your review of the 19 materials Jack Flynn provided you, right? 20 MR. BISS: Object to the form. 21 Argumentative. 22 THE WITNESS: Jack Flynn 23 didn't provide me with any 24 materials.</p>	<p style="text-align: right;">Page 197</p> <p>1 BY MS. BOLGER: 2 Q. The only two things -- 3 MR. BISS: Mine are. 4 BY MS. BOLGER: 5 Q. -- that you -- 6 MS. BOLGER: I mean, you are a 7 God among men, Stephen. 8 BY MS. BOLGER: 9 Q. The only two things that -- we have 10 two things here, right? 11 We have your report where you say, 12 "There is no basis to attribute the 13 recitation of the QAnon oath in support of 14 QAnon." 15 And we have a book where you say, 16 based on Will Sommer's article, by the way, 17 that General Flynn was pledging allegiance to 18 QAnon. And it's exactly the same behavior. 19 And the only thing that makes them 20 different, as you sit here, is the 21 information Jack Flynn provided you in this 22 litigation, correct? 23 MR. BISS: Object to the form. 24 Argumentative.</p>

<p style="text-align: right;">Page 198</p> <p>1 THE WITNESS: No, I already 2 said, there are a lot of things 3 that make them different, and you 4 keep drawing the same false 5 equivalency between them. 6 BY MS. BOLGER: 7 Q. What are they? 8 A. General Flynn's behavior was 9 covered in Will Sommer's report, and it 10 included things other than stating the words 11 "Where We Go One, We Go All." 12 There were a lot of other 13 journalistic reports about him that also said 14 that he was a central figure in the QAnon 15 movement. 16 Whether or not those reports were 17 true, we relied on them, we cited them. We 18 assumed that people who compiled them did 19 their homework, and ascertained the facts as 20 they printed them. 21 Q. You're aware that -- and we talked 22 about this -- I'm just going to briefly set 23 the stage -- after the Flynn's posted the 24 QAnon or the non-QAnon oath or whatever it</p>	<p style="text-align: right;">Page 200</p> <p>1 Q. Meaning, your book? 2 A. And I am a victim of media 3 reporting as well, and I cite it, to be 4 clear, that it's not my reporting. It's 5 recitation of media reporting. 6 Q. Well, I mean, you wrote this book, 7 right -- 8 A. Mm-humm. 9 Q. -- 2021, by Mia Bloom and Sophia 10 Moskalenko, right? 11 A. Yes. 12 Q. Right. 13 It's your book? 14 A. Yes. 15 Q. Right. 16 MR. BISS: Is there a 17 question? 18 BY MS. GILBERT: 19 Q. If Jack Flynn was so wronged by the 20 association with QAnon, why wouldn't he take 21 it down? 22 MR. BISS: Object to the form. 23 THE WITNESS: I'm not 24 Jack Flynn. I don't know why he</p>
<p style="text-align: right;">Page 199</p> <p>1 was on the 4th of July, there was an enormous 2 amount of press saying, "Hey, they just 3 posted a QAnon oath," right? 4 A. Yes. 5 Q. Okay. And you're aware that, even 6 today, if you went to General Flynn's Twitter 7 feed, it's still there, right? 8 A. I did not go to General Flynn's 9 Twitter feed, so I don't know. 10 Q. Okay. Well, I'll make a 11 representation to you that no member of the 12 Flynn family ever took it down after they 13 were -- until January 6th when they were 14 kicked off of Twitter or left because they 15 were in protest, right? They were there from 16 July 4, 2020 until January 8th, 2021, right, 17 sitting on the internet, acquiring the 18 secondary meaning that the Flynn family said 19 the QAnon oath, right? 20 A. Maybe. 21 Q. Well, you heard them saying it, you 22 said it? 23 A. Well, it was helped being acquired 24 by media reporting on it, right?</p>	<p style="text-align: right;">Page 201</p> <p>1 did not take it down. 2 BY MS. BOLGER: 3 Q. I mean, you thought you were here 4 to articulate his intent, so tell me what -- 5 A. No, no, no. I'm here to articulate 6 his intent beyond reciting his records. 7 You're asking me now about 8 something completely different and the intent 9 behind that. And I didn't familiarize myself 10 with of the materials relevant to that. 11 In the aftermath, you know, why he 12 didn't take it down, I don't know how to 13 answer that without information, and I don't 14 have information. 15 Q. So I'll just ask one last question 16 on this topic. 17 Despite the fact that you know that 18 Jack Flynn repeatedly tweeted out, "Where We 19 Go One, We Go All," despite the fact that you 20 know that Jack Flynn repeatedly tweeted out 21 memes of QAnon, despite the fact that you 22 know that he tweeted Q-drops, actual Q-drops, 23 on three occasions, despite that the fact 24 that he tweeted out, "Take the oath," and</p>

<p style="text-align: right;">Page 202</p> <p>1 posted a video of him saying the QAnon oath, 2 despite the fact that he did it as part of a 3 take the oath movement created by a Q-drop, 4 which you just testified to, despite the fact 5 that he raised money for his brother by 6 putting out the QAnon hashtag, nakedly and 7 unreservedly he said, "Yes, we did anything 8 we could to get money for our brother," 9 despite the fact that he tweeted out a link 10 saying, "Please buy this T-shirt that says 11 'Where We Go One, We Go All,'" despite all of 12 that, you're really still comfortable saying 13 there's no basis to attribute his recitation 14 of the QAnon oath to his support of QAnon? 15 A. Yes. I believed I addressed most, 16 if not all, of those points earlier. 17 Q. And the -- the reason you're still 18 comfortable with it is because you think he 19 felt something different in his heart? 20 A. Belief is part, and emotion, which 21 is what you're eluding to in a pejorative 22 manner, but it's also a matter of cognition. 23 So his heart and his head, if you will. 24 Q. None of which were public, neither</p>	<p style="text-align: right;">Page 204</p> <p>1 BY MS. BOLGER: 2 Q. -- "publicly"? 3 A. That is not a criterion by -- that 4 is of any relevance to my opinion. 5 Q. I'm just asking you whether you 6 ever saw -- 7 A. I -- I didn't, but I don't think 8 it's relevant. 9 Q. Okay. Again, your basis is based 10 on things the public did not see, right? 11 A. No. If I don't hurt anybody, the 12 public sees that I don't hurt anybody. If I 13 don't kill anybody, the public sees that I 14 don't kill anybody. Even though there's the 15 absence of action, the absence of action is 16 publicly available for others to examine. 17 In the same sense, the fact that 18 Jack Flynn never stated his belief in any of 19 the QAnon conspiracy theories, the absence of 20 that is already evidence of his state of mind 21 and belief. 22 Q. So the fact that he tweeted out 23 QAnon conspiracy theories -- 24 MR. BISS: She just said he</p>
<p style="text-align: right;">Page 203</p> <p>1 of which was public? 2 A. Well, absence of tweeting anything 3 about QAnon conspiracy theories is public. 4 That he didn't say he believed that, you 5 know, Tom Hanks is kidnapping and torturing 6 children or Hillary Clinton is drinking 7 children's blood or that -- you know, that 8 was public. 9 Q. But you told me it's -- QAnon is 10 a la carte, so you can't be saying there's a 11 formula for how you indicate QAnon belief, 12 right? 13 A. Right, but I didn't see any of the 14 QAnon conspiracy theories being tweeted by 15 Jack Flynn. 16 Q. Right. 17 Where did you see Jack Flynn 18 publicly say or do anything that said, "Even 19 though I've taken this oath, even though I've 20 taken your money, even though I've used these 21 memes, I really don't support QAnon" -- 22 MR. BISS: Object to 23 testimony? 24</p>	<p style="text-align: right;">Page 205</p> <p>1 didn't. 2 BY MS. BOLGER: 3 Q. The fact that he tweeted out QAnon 4 memes, QAnon slogans, and the occasional 5 QAnon conspiracy theory, because we talked -- 6 looked at him talking about the Cabal, to you 7 is somehow an indication that he didn't 8 believe in QAnon? 9 MR. BISS: Object to the form. 10 THE WITNESS: I would dispute 11 that the Cabal is a representation 12 of QAnon conspiracy theory. The 13 cabal is a term that's been in use 14 since at least early 20th Century 15 where it was made famous by the 16 protocols of the elders of Zion, 17 and since then it has been used 18 consistently to denote malevolent 19 government that, you know, is -- is 20 intending to do harm behind the 21 scenes. And I forgot what other 22 things you mentioned. 23 But there's just kind of like 24 a general lumping of things as</p>

<p style="text-align: right;">Page 206</p> <p>1 QAnon memes that is a very broad</p> <p>2 category, and I would take issue</p> <p>3 with that.</p> <p>4 BY MS. BOLGER:</p> <p>5 Q. What I was saying was it seems to</p> <p>6 me that what you're saying is the fact that</p> <p>7 Jack Flynn engaged in all this public-facing</p> <p>8 QAnon speech is somehow evidence to you that</p> <p>9 he didn't believe in QAnon, and I don't</p> <p>10 understand how that's consistent.</p> <p>11 MR. BISS: Object to the form.</p> <p>12 THE WITNESS: I don't agree</p> <p>13 that he engaged in public-facing</p> <p>14 QAnon speech. That's the</p> <p>15 difference between how you're</p> <p>16 characterizing my statement and how</p> <p>17 I actually, I believe, stated it.</p> <p>18 BY MS. BOLGER:</p> <p>19 Q. Okay. Well, then, maybe we're</p> <p>20 getting somewhere.</p> <p>21 So it is your position, as you sit</p> <p>22 here, that every single time that Jack Flynn</p> <p>23 tweeted out, "Where We Go One, We Go All," or</p> <p>24 re-tweeted a Q-drop or re-tweeted a meme that</p>	<p style="text-align: right;">Page 208</p> <p>1 is, right?</p> <p>2 MR. BISS: Who's "we"?</p> <p>3 THE WITNESS: Who's "we"?</p> <p>4 BY MS. BOLGER:</p> <p>5 Q. "We," I don't know who it is.</p> <p>6 A. I don't know what you know.</p> <p>7 Q. "We" -- "We," the defendant, is</p> <p>8 what I meant.</p> <p>9 MR. BISS: Kate, it's in the</p> <p>10 report. It says it right there.</p> <p>11 MS. BOLGER: It's not. It's</p> <p>12 not clear.</p> <p>13 MR. BISS: It's crystal clear.</p> <p>14 Only to you.</p> <p>15 BY MS. BOLGER:</p> <p>16 Q. Is it accidental to use "WWG1WGA"</p> <p>17 over and over and over and over again? Can</p> <p>18 you accidentally have used a QAnon slogan over</p> <p>19 and over and over and over and over and over</p> <p>20 and over?</p> <p>21 MR. BISS: Object to the form.</p> <p>22 THE WITNESS: I just gave you</p> <p>23 examples from people who are</p> <p>24 clearly not QAnon followers, that I</p>
<p style="text-align: right;">Page 207</p> <p>1 had "QAnon" on it or "The Great Awakening" or</p> <p>2 "The Storm" or any of that stuff, you think</p> <p>3 every time Jack Flynn did that he was not</p> <p>4 using QAnon slogans?</p> <p>5 A. I did not say that. He might have</p> <p>6 been using QAnon slogans, but that is not the</p> <p>7 same as using them for expressing QAnon</p> <p>8 beliefs. They -- they may be used by</p> <p>9 accident. They may be used in</p> <p>10 misunderstanding. They may be used as a</p> <p>11 collateral damage when other things are being</p> <p>12 re-tweeted.</p> <p>13 There are all kinds of reasons why</p> <p>14 people may end up -- like I said, I probably</p> <p>15 have at one point or another re-tweeted some</p> <p>16 QAnon-related material, and that does not at</p> <p>17 all mean that I believe QAnon or support</p> <p>18 QAnon or I'm a QAnon follower.</p> <p>19 Q. The only social media of</p> <p>20 Jack Flynn's that you know is the stuff I've</p> <p>21 shown you, right?</p> <p>22 A. And that I was provided for -- for</p> <p>23 this case.</p> <p>24 Q. Okay. But we don't know what it</p>	<p style="text-align: right;">Page 209</p> <p>1 was able to find very quickly, who</p> <p>2 use the WW -- whatever, "Where We</p> <p>3 Go One, We Go All" for -- I don't</p> <p>4 know if there's is accident --</p> <p>5 those people are probably not</p> <p>6 aware. And in that sense, they</p> <p>7 don't have awareness of it being a</p> <p>8 QAnon slogan. It could be termed</p> <p>9 coincidental.</p> <p>10 It could also be termed -- you</p> <p>11 know, I don't know, just a</p> <p>12 different purpose of use. So,</p> <p>13 yeah, empirically speaking, it can</p> <p>14 be done because it has been done.</p> <p>15 BY MS. BOLGER:</p> <p>16 Q. So do you -- is it your testimony</p> <p>17 that when other people use "Where We Go One,</p> <p>18 We Go All," it's an indication of QAnon</p> <p>19 support, but, uniquely, on planet earth when</p> <p>20 Jack Flynn does it, it's not?</p> <p>21 MR. BISS: Object to the form.</p> <p>22 THE WITNESS: I just said,</p> <p>23 there are other examples of people</p> <p>24 using it without any reason to</p>

<p style="text-align: right;">Page 210</p> <p>1 think that they're QAnon followers, 2 so not uniquely at all. 3 BY MS. BOLGER: 4 Q. So that's in 2023. Stick to 2020. 5 A. I don't know -- I don't know the 6 date. You're saying it like you know what 7 I'm talking about, but it seems like -- 8 Q. Well, it was because you told me 9 last night is when you looked this up, so 10 that's 2023. 11 A. Yeah, but the search does not limit 12 to the year. It could be from two years ago, 13 or it could be from three years ago. 14 Q. When you wrote your book -- 15 A. Yes. 16 Q. -- in 2021 -- 17 A. Yes. 18 Q. -- you told me -- you testified 19 earlier that you can't think of anybody who 20 used, "Where We Go One, We Go All" outside of 21 the QAnon movement. 22 So when you wrote your book in 23 2021, is it your testimony that when 24 everybody else used "Where We Go One, We Go</p>	<p style="text-align: right;">Page 212</p> <p>1 So terms like, "Unique to 2 Jack Flynn," I would never stand behind. 3 There's probably enough people on this earth 4 using Twitter that, you know, someone 5 somewhere has a different purpose for these 6 words. That's -- 7 Q. So you wrote a book that accused -- 8 that said that 97 people were candidates who 9 were QAnon supporting candidates. 10 MR. BISS: Object to the form. 11 BY MS. BOLGER: 12 Q. And, then, we went back and looked 13 at the -- at Exhibit-27 where it had the 14 people that who 97 -- 15 A. I'm sorry, what did you say I said 16 about those people? 17 Q. That there were 97 QAnon supporting 18 candidates. 19 MR. BISS: Let's see if that's 20 on Page 18. 21 THE WITNESS: Page 19? 22 BY MS. BOLGER: 23 Q. 18. 24 A. 18.</p>
<p style="text-align: right;">Page 211</p> <p>1 All," they were signifying support for the 2 QAnon movement, but when Jack Flynn done 3 it -- did it, he wasn't -- 4 MR. BISS: Object to the form. 5 BY MS. BOLGER: 6 Q. -- uniquely in the world? 7 A. You misrepresent -- 8 MR. BISS: Argumentative. 9 THE WITNESS: You misrepresent 10 -- 11 BY MR. BISS: 12 Q. I'm asking you. 13 A. Yes, you -- but in asking me you 14 include a statement about my test- -- my 15 earlier testimony that is incorrect. 16 Q. Correct me. 17 A. I did not say that just -- that I 18 was not aware of anyone using it. I said 19 that I wasn't looking into that, and, so, I 20 was not aware. I did not do the search I did 21 now then, and, statistically speaking, it is 22 likely that someone somewhere uses this term 23 in a different -- for a different purpose 24 than QAnon.</p>	<p style="text-align: right;">Page 213</p> <p>1 Q. On the left-hand side. It's 2 three-quarters the way down the page. 3 MR. BISS: Second full 4 paragraph, last sentence. 5 THE WITNESS: Okay. 6 "In the 2020 primaries, there 7 were 97 QAnon-affiliated 8 candidates." 9 That is not the same. 10 BY MS. BOLGER: 11 Q. Okay. That's fine. 12 You're right. I misquoted you, I'm 13 sorry. It's QAnon-affiliated candidates, but 14 you based it on Exhibit-27, right? 15 A. I did, yes. 16 Q. Okay. And in Exhibit-27, we went 17 through candidate after candidate after 18 candidate. 19 A. Yes. 20 Q. And all of those people were on 21 that list because they used QAnon slogans, 22 right? 23 A. It seems that way, although I don't 24 know Mr. Kaplan's methodology, and I can't</p>

<p style="text-align: right;">Page 214</p> <p>1 speak to that.</p> <p>2 Q. But you used it in your book, so</p> <p>3 you must have thought it was pretty good.</p> <p>4 A. No, I could have thought it was</p> <p>5 only thing available, and --</p> <p>6 Q. So you just -- you just were okay</p> <p>7 with anything that was available and threw it</p> <p>8 in your book?</p> <p>9 A. No, I -- I kind of filtered</p> <p>10 journalists by reputability, hoping that that</p> <p>11 correlated with their journalistic methods.</p> <p>12 But some data is better than no data, and as</p> <p>13 long as I cited, then, I feel like I'm doing</p> <p>14 a, you know, fairly good job of representing</p> <p>15 what's out there.</p> <p>16 Q. So you wrote in a book that all 97</p> <p>17 of those candidates were QAnon affiliated?</p> <p>18 A. Yes.</p> <p>19 Q. The reason Alex Kaplan gave for</p> <p>20 their affiliations were their public social</p> <p>21 media uses of words like, "Where We Go One,</p> <p>22 We Go All," and "Take The Oath"?</p> <p>23 A. At least some of the reasons he</p> <p>24 used to mark them, right? We don't know what</p>	<p style="text-align: right;">Page 216</p> <p>1 Q. Is Jack Flynn affiliated with</p> <p>2 QAnon?</p> <p>3 A. Not by Kaplan.</p> <p>4 Q. By you.</p> <p>5 Is Jack Flynn affiliated with</p> <p>6 QAnon?</p> <p>7 A. Not in my opinion, but I'm not</p> <p>8 Kaplan. Kaplan has a different opinion.</p> <p>9 Q. Why are the same things that</p> <p>10 were -- you accepted as affiliating someone</p> <p>11 with QAnon in Kaplan's report different for</p> <p>12 Jack Flynn?</p> <p>13 A. Because, A, I don't -- I didn't</p> <p>14 think that this hashtag was the only thing</p> <p>15 that would be a necessary and sufficient</p> <p>16 condition to be called a supporter of QAnon.</p> <p>17 I --</p> <p>18 Q. It's not.</p> <p>19 A. Okay. So when it's not, there are</p> <p>20 other things that speak to somebody's</p> <p>21 connection with QAnon, and I, at that time,</p> <p>22 had no way to triangulate any of these data,</p> <p>23 so I presented them and I cited them.</p> <p>24 And I used the word "affiliated,"</p>
<p style="text-align: right;">Page 215</p> <p>1 else, if anything.</p> <p>2 Q. That's fine.</p> <p>3 Bearing that your own book accepts</p> <p>4 Mr. Kaplan's description of supporting QAnon,</p> <p>5 and he uses "support," and you use</p> <p>6 "affiliated," do you believe that Jack Flynn</p> <p>7 is QAnon-affiliated?</p> <p>8 MR. BISS: Object to the form.</p> <p>9 THE WITNESS: Okay. We're --</p> <p>10 we're down to the nitty-gritty of</p> <p>11 terms here, but QAnon</p> <p>12 affiliating -- affiliated means</p> <p>13 that they were affiliated with</p> <p>14 QAnon, among other things, by</p> <p>15 Kaplan. There is a public report</p> <p>16 where these people linked with</p> <p>17 QAnon.</p> <p>18 BY MS. BOLGER:</p> <p>19 Q. Your book uses the word</p> <p>20 "affiliated."</p> <p>21 A. Yeah, yeah.</p> <p>22 Q. Your book.</p> <p>23 A. Yes, and they are. And here's</p> <p>24 evidence that they are.</p>	<p style="text-align: right;">Page 217</p> <p>1 as opposed to "support" because they are, in</p> <p>2 fact, affiliated, you know. This is the</p> <p>3 thing that affiliates them.</p> <p>4 And Jack Flynn is not in here.</p> <p>5 And, so, I wouldn't make the same judgment as</p> <p>6 if Kaplan, indeed, only used the use of</p> <p>7 hashtag, I would not rely on that to make a</p> <p>8 judgment about somebody being a supporter.</p> <p>9 And, so, I would not put Jack Flynn</p> <p>10 into this report.</p> <p>11 Q. I didn't ask you if you would put</p> <p>12 him in the report.</p> <p>13 I asked you if you said, as you sit</p> <p>14 here, do you believe given that you published</p> <p>15 a book that described 97 affiliated QAnon</p> <p>16 individuals, based on the Kaplan article,</p> <p>17 based on this criteria that you put in your</p> <p>18 book, do you think Jack Flynn is affiliated</p> <p>19 with QAnon?</p> <p>20 MR. BISS: Object to the form.</p> <p>21 Argumentative. Object to the</p> <p>22 histrionics.</p> <p>23 THE WITNESS: I didn't --</p> <p>24 there is no criteria, other than</p>

<p style="text-align: right;">Page 218</p> <p>1 Kaplan's criteria. I did not 2 describe a set of criteria. 3 I said, "These people are 4 affiliated. Here is a reference to 5 the report that affiliates them." 6 BY MS. BOLGER: 7 Q. Do you think based on that -- 8 A. Mm-humm. 9 Q. -- Jack Flynn is affiliated with 10 QAnon? 11 MR. BISS: Asked and answered. 12 MS. BOLGER: Definitely asked. 13 MR. BISS: And answered. 14 THE WITNESS: I would not call 15 him a supporter in the same way 16 that Kaplan calls him, so he would 17 not -- 18 BY MS. BOLGER: 19 Q. I didn't say, "support." I said, 20 "affiliated." You know the words. 21 A. I think there's -- there's a little 22 bit of a trickery because "affiliated" can be 23 interpreted in two different ways. 24 And if we're talking about being</p>	<p style="text-align: right;">Page 220</p> <p>1 QAnon believers treat him as a 2 significant figure, that people who 3 follow QAnon consider Jack Flynn 4 very important and kind of central 5 to the movement. 6 MR. BISS: You said, 7 "Jack Flynn." 8 THE WITNESS: I'm sorry, I'm 9 sorry, I'm sorry. 10 General Flynn. 11 Thank you. 12 BY MS. BOLGER: 13 Q. And you would agree with me that 14 General Flynn has financially benefited from 15 that support, right? 16 MR. BISS: Object to the form. 17 THE WITNESS: I don't have the 18 facts. It seems that way from the 19 reporting that I've seen, but I -- 20 yeah. I would need to see tax 21 returns or something. 22 BY MS. BOLGER: 23 Q. Well, let's look at your book. 24 A. (Witness complies.)</p>
<p style="text-align: right;">Page 219</p> <p>1 affiliated in the public discourse, and this 2 is what this is doing, then, by CNN's report 3 and all the publicity that followed and cited 4 CNN report where Jack Flynn was presented as 5 a follower, he would indeed be affiliated. 6 But if we're using "affiliated" as 7 a supporter, which is what Kaplan did here, 8 then, no. I hope that answers it. 9 Q. With one caveat. 10 You said the CNN report affiliated 11 Jack Flynn with QAnon, and I think you mean 12 the reporting after the 4th of July by CNN, 13 correct? 14 A. Yes. 15 Q. Okay. So not the report here, the 16 report in July of 2020? 17 A. Yes. 18 Q. Okay. Okay. You'll agree with me 19 that General Flynn is a significant figure in 20 QAnon? 21 MR. BISS: Object to the form. 22 THE WITNESS: I would 23 partition, if you would allow. 24 I absolutely agree that the</p>	<p style="text-align: right;">Page 221</p> <p>1 Q. You say on Page 44 of your book, in 2 the final paragraph, you say, "A handful of" 3 -- sorry, the dramatic pause is to find my 4 glasses -- "a handful of influencers and 5 high-profile conspiracists (like General 6 Michael Flynn) made a lot of money by selling 7 Q-branded items. According to Vice News, 8 many links with QAnon content on the 9 right-wing Parler platform -- Parler 10 platform, QAnon Subreddits, or other 11 Q-promoting posts led to General Flynn's 12 legal defense fund website. Flynn's website 13 contained Q merchandise until it was taken 14 down after the failed January 6th 15 insurrection." 16 Do you see that? 17 A. Yes. 18 Q. No cite there. 19 That's your book. 20 A. Yes, it is. "According to Vice 21 News, many links with QAnon content" -- 22 Q. There's no -- there's no -- that's 23 what I meant. There's no citation. 24 A. There should be a citation. That</p>

<p style="text-align: right;">Page 222</p> <p>1 must be a mistake. I'm so sorry.</p> <p>2 Q. Okay. So you -- you agree with me,</p> <p>3 then, that General Flynn made a lot of money</p> <p>4 out of QAnon?</p> <p>5 A. I said that the reporting seems to</p> <p>6 indicate that.</p> <p>7 Q. That's not what it says.</p> <p>8 A. It says, "According to Vice News."</p> <p>9 Q. No, no. The sentence before that</p> <p>10 says, "A handful of influencers and</p> <p>11 high-profile conspiracists, like General</p> <p>12 Michael Flynn, made a lot of money by selling</p> <p>13 QAnon-branded items," right?</p> <p>14 That's your sentence, your English</p> <p>15 language sentence?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. The other thing I thought</p> <p>18 was very interesting is if you look at</p> <p>19 Page 156, there's a discussion -- there's a</p> <p>20 discussion of General Flynn's movement in</p> <p>21 Japan, which I thought -- I thought was very</p> <p>22 interesting and didn't know about.</p> <p>23 Did -- were you involved in this</p> <p>24 portion of the book?</p>	<p style="text-align: right;">Page 224</p> <p>1 --[sic] sorry for misstating that -- "III."</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. Are you aware that Jack Flynn has</p> <p>5 re-tweeted @oakabaeri9III?</p> <p>6 A. I was not aware of that.</p> <p>7 MS. BOLGER: Okay. Do you</p> <p>8 want to take a break, or do you</p> <p>9 want to keep going?</p> <p>10 THE WITNESS: I'm okay. We</p> <p>11 can keep going.</p> <p>12 BY MS. BOLGER:</p> <p>13 Q. So there came a time when you were</p> <p>14 asked to do a rebuttal part on -- or rebuttal</p> <p>15 report on Mr. Rothschild's report, right?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. You know Mike Rothschild, I</p> <p>18 guess.</p> <p>19 A. I never met him, never had a</p> <p>20 conversation with him, but I know of him.</p> <p>21 Q. Okay.</p> <p>22 MS. BOLGER: I'm going to ask</p> <p>23 -- I'm going to mark it as</p> <p>24 Exhibit-426. And it's Tab 56 --</p>
<p style="text-align: right;">Page 223</p> <p>1 A. No. It's Mia's chapters.</p> <p>2 Q. Okay. Which chapters were yours?</p> <p>3 A. 3, 4, 6. And in Chapter 5, there's</p> <p>4 a section on Russian QAnon, and that was</p> <p>5 mine.</p> <p>6 Q. Okay. Do you have any reason to</p> <p>7 doubt what Mia published?</p> <p>8 A. No.</p> <p>9 Q. Okay. So on Page 156, there's a</p> <p>10 paragraph that starts, "In the International</p> <p>11 chapters."</p> <p>12 A. Mm-humm.</p> <p>13 Q. And it has a line that says, "In</p> <p>14 Japan, General Michael Flynn is QAnon's focal</p> <p>15 point more than President Trump. Japan is a</p> <p>16 receptive milieu to conspiratorial thinking</p> <p>17 in part because Mū Magazine has peddled</p> <p>18 various conspiracies for 40 years and 2chan</p> <p>19 originated in Japan."</p> <p>20 "Based on Graphika's research,</p> <p>21 General Flynn is aware of his influence in</p> <p>22 Japan and follows several QAnon influencers</p> <p>23 in the Far East, including one woman whose</p> <p>24 Twitter handle" is -- or "was @oakabaeri19-</p>	<p style="text-align: right;">Page 225</p> <p>1 no, that's the wrong one.</p> <p>2 THE COURT REPORTER: I'm going</p> <p>3 to need a break soon.</p> <p>4 MS. BOLGER: Okay. Why don't</p> <p>5 you -- why don't we just take a</p> <p>6 break now, and, then, we'll do the</p> <p>7 rest when we come back.</p> <p>8 THE VIDEOGRAPHER: The time is</p> <p>9 2:23. We are going off the video</p> <p>10 record. This ends Media Unit</p> <p>11 Number 3.</p> <p>12 - - -</p> <p>13 (Whereupon, there was a brief</p> <p>14 recess held off the video record.)</p> <p>15 - - -</p> <p>16 THE VIDEOGRAPHER: The time is</p> <p>17 2:30. We are going back on the</p> <p>18 video record. This begins Media</p> <p>19 Unit Number 4.</p> <p>20 - - -</p> <p>21 (Back on the video record.)</p> <p>22 - - -</p> <p>23 (Whereupon, Exhibit-426,</p> <p>24 Rebuttal Expert Report, Dated</p>

<p style="text-align: right;">Page 226</p> <p>1 6/20/23, was marked for 2 identification.) 3 - - - 4 BY MS. BOLGER: 5 Q. Okay. I'm going to hand you your 6 rebuttal expert report, dated June 20, 2023, 7 which is going to Exhibit-426, which is 8 Tab 56. 9 A. Thank you. 10 Q. And if you'll just identify for the 11 record that that is your expert rebuttal 12 report, right. 13 A. It is. 14 Q. Okay. We've talked at some length 15 about what you looked at in creating your 16 original report, and I'm wondering now were 17 there additional things you looked in 18 drafting your rebuttal? 19 A. So I looked at both 20 Mr. Rothschild's and Dr. Giddens' reports. I 21 did some searching for journa- -- standard 22 journalistic practices that Mr. Rothschild 23 references in his report. 24 I -- we're talking about additional</p>	<p style="text-align: right;">Page 228</p> <p>1 its own." 2 What else? I researched symbology 3 associated with Free Masons, because I knew 4 there were some symbols on the one dollar 5 bill from before, so I made sure that I could 6 speak to that to the extent needed for the 7 report. 8 I looked back on some of the 9 definitions in stereotyping. And, also, I, 10 you know, looked for all kinds of examples of 11 measuring beliefs addressing Mr. Rothschild's 12 statement that beliefs cannot be 13 quantitatively measured, and to provide 14 examples of different kinds of ways to 15 measure beliefs quantitatively. I looked at 16 both social scientific and public polling on 17 that. 18 What else? I think that's it. 19 Q. Okay. Did you look at additional 20 social media posts by Jack, Leslie, General, 21 Lori, Val Flynn in the rebuttal report? 22 A. No. 23 Q. Okay. The document -- the 24 documents -- the documents you just described</p>
<p style="text-align: right;">Page 227</p> <p>1 things, right. So let's see... 2 Q. Obviously, you read his report? 3 A. Yes, yes. Yes. I looked for 4 scientific reports of journalistic biases, 5 especially as pertains to new religious 6 movements, which QAnon is often believed to 7 be, and Mr. Rothschild's book calls it a 8 cult, which is a pejorative term for any 9 religious movements. 10 Q. But you've also used the word, 11 "cult," when you refer to QAnon, right? 12 A. I used it to say some people that 13 it's cult-like. I didn't say it was a cult. 14 I did not say that it was a cult. 15 Q. Okay. You're completing your 16 answer? 17 A. Yes. 18 Q. So that's all the -- 19 A. No. No. I was completing my 20 answer to the question you just asked me 21 about me using the word, "cult." 22 I researched this other phrase that 23 came to mind, that I knew about before, which 24 is "Jedem das Seine" translated as, "To each</p>	<p style="text-align: right;">Page 229</p> <p>1 for me were sort of largely third-party 2 documents, as in things outside of the 3 parties to this litigation. 4 Did you get new documents from 5 Mr. Biss to rebut Mr. Rothschild's report? 6 A. I believe the motion hearing to 7 dismiss was provided to me after the first 8 report. 9 I don't remember what, if anything 10 else, would have been provided from the case 11 materials after. You should ask Mr. Biss. 12 Q. Okay. 13 MS. BOLGER: We'll call for 14 production of that as well. 15 BY MS. BOLGER: 16 Q. Did you go back and watch the CNN 17 report before you did your rebuttal -- the 18 CNN report at issue here before you did your 19 rebuttal report? 20 A. No. 21 Q. Why not? 22 A. I felt like I got the gist. I 23 didn't need to see it again. 24 Q. With all due respect, you got it</p>

<p style="text-align: right;">Page 230</p> <p>1 wrong this morning when you described it, 2 right? 3 A. That is true. 4 Q. Okay. Are you aware that 5 Mr. Rothschild has been qualified as an 6 expert on QAnon in two other litigations? 7 A. I am. I read his qualifications. 8 Q. Okay. What is the expert opinion 9 of Mr. Rothschild's that you felt you were 10 rebutting, or you were rebutting? 11 Let me do it again. It was a 12 really awkward question, and I don't know 13 why. 14 What was -- what was 15 Mr. Rothschild's ex- -- expert opinion that 16 you were seeking to rebut? 17 A. That Jack and Leslie Flynn can be 18 accurately described as QAnon followers. 19 - - - 20 (Whereupon, Exhibit-427, 21 Rothschild Expert Report, was 22 marked for identification.) 23 - - - 24</p>	<p style="text-align: right;">Page 232</p> <p>1 that Jack and Leslie Flynn were 2 either signifying that they were 3 QAnon followers, or were 4 comfortable being associated with 5 QAnon when they stood next to 6 General Michael Flynn, as he 7 repeated the QAnon mantra, "Where 8 We Go One, We Go All." 9 BY MS. BOLGER: 10 Q. So that strikes me as different 11 from what you said. 12 I think what you said was that you 13 felt Mr. Rothschild's opinions was that it 14 was acc- -- and I -- and I -- and if I'm 15 getting it slightly wrong, it's only because 16 I'm tired. 17 I think what you said was that 18 Mike Rothschild said that the Flynn's were 19 accurately described as QAnon followers, and 20 that is not what you just read to me. 21 MR. BISS: Object to the form. 22 BY MS. BOLGER: 23 Q. What you read to me was to conclude 24 that Jack and Leslie Flynn were either</p>
<p style="text-align: right;">Page 231</p> <p>1 BY MS. BOLGER: 2 Q. Okay. So let's take a look at his 3 report. So this is Exhibit-427 -- 4 Exhibit-427, which is Mike Rothschild's 5 report. 6 A. (Witness complies.) 7 Q. Can you tell me where you think he 8 says that Jack and Leslie Flynn can be 9 accurately described as QAnon followers? 10 A. In my expert opinion, it says, 11 Page 3, at the top, "It would be reasonable 12 for any news organization, including CNN" -- 13 THE COURT REPORTER: Slow 14 down. 15 THE WITNESS: Oh, I'm sorry. 16 THE COURT REPORTER: That's 17 okay. 18 MS. BOLGER: See, I'm not the 19 only one here. 20 THE WITNESS: Where did I 21 stop? 22 THE COURT REPORTER: "Any news 23 organization, including CNN." 24 THE WITNESS: -- "to conclude</p>	<p style="text-align: right;">Page 233</p> <p>1 signifying that they were QAnon followers, or 2 were comfortable being associated with QAnon, 3 right, that's what that says? 4 A. I did not recite Mike Rothschild's 5 report. I told you what I was addressing in 6 it. 7 Q. Right. 8 And I'm asking you where that thing 9 that you were addressing -- Is? 10 A. Mm-humm. 11 Q. -- in the report. 12 A. Well, the statement that I read to 13 you does not say verbatim what I said, but, 14 you know, that they could be -- what's the 15 words here -- they would be reasonably 16 labeled as QAnon followers, right? 17 Q. No, that's not what it says. 18 A. "It would be reasonable for any 19 news organizations to conclude that Jack and 20 Leslie Flynn were either signifying that they 21 were QAnon followers" -- 22 Q. And the rest of the sentence? 23 A. -- "or were comfortable with being 24 associated with QAnon."</p>

<p style="text-align: right;">Page 234</p> <p>1 Q. Right.</p> <p>2 So that's his conclusion, right?</p> <p>3 It's not that they were QAnon followers.</p> <p>4 It's that it was reasonable to conclude that</p> <p>5 they were signifying they were QAnon</p> <p>6 followers, or were comfortable with being</p> <p>7 associated with QAnon, right, that's his --</p> <p>8 that's his conclusion.</p> <p>9 A. And he also says some other things</p> <p>10 that is --</p> <p>11 Q. You want to look at the last --</p> <p>12 A. Yeah.</p> <p>13 Q. -- 31?</p> <p>14 A. Yeah. "It is impossible to know</p> <p>15 with certainty whether Jack and Leslie Flynn</p> <p>16 believe QAnon was real" --</p> <p>17 Q. Where are you?</p> <p>18 A. Very last paragraph. "But their</p> <p>19 actions speak clearly. They knew what the</p> <p>20 QAnon movement was."</p> <p>21 Actually, knowing is not an action,</p> <p>22 so that is a contradiction.</p> <p>23 He says, "Their actions speak</p> <p>24 clearly." And, then, he lists as an</p>	<p style="text-align: right;">Page 236</p> <p>1 Q. In general, or do you mean Jack and</p> <p>2 Leslie Flynn?</p> <p>3 A. I only am here giving an opinion on</p> <p>4 Jack and Leslie Flynn, but I can speak to in</p> <p>5 general as well, but these particular things</p> <p>6 are not hallmarks of QAnon followers in</p> <p>7 general.</p> <p>8 Q. What -- what's your basis for</p> <p>9 saying that?</p> <p>10 A. My basis for saying that is the</p> <p>11 years I've spent researching QAnon and</p> <p>12 reading and following up on other's research</p> <p>13 on QAnon, and the understanding that emerged</p> <p>14 as a result of a lot of research since,</p> <p>15 pretty much, 2020, and still a growing body</p> <p>16 of research of what is QAnon and what a QAnon</p> <p>17 follower is.</p> <p>18 Q. Which you say repeatedly has</p> <p>19 evolved over years.</p> <p>20 A. Yes.</p> <p>21 Q. Okay. So let's look -- look back</p> <p>22 at your rebuttal.</p> <p>23 A. (Witness complies.)</p> <p>24 Q. So you -- your "Reporting Facts"</p>
<p style="text-align: right;">Page 235</p> <p>1 example --</p> <p>2 Q. I understand what you're saying. I</p> <p>3 disagree with you. That was my head move.</p> <p>4 Go ahead.</p> <p>5 A. Okay. That they knew what QAnon</p> <p>6 movement was. They wanted to appeal to QAnon</p> <p>7 but believers for financial purposes, what</p> <p>8 does that speak clearly to?</p> <p>9 In my opinion, not anything that is</p> <p>10 relevant to, you know, this front statement,</p> <p>11 "and had no trouble sharing their interest in</p> <p>12 Q with others."</p> <p>13 And, again, what does that speak</p> <p>14 to, because I share my interest in Q, and</p> <p>15 Mr. Rothschild shares his interest in Q with</p> <p>16 others.</p> <p>17 And, then, he says, "By any</p> <p>18 reasonable definition these are the hallmarks</p> <p>19 of QAnon followers."</p> <p>20 So he's looking for hallmarks of</p> <p>21 QAnon followers. That's his concluding</p> <p>22 statement. And in my opinion, that is wrong.</p> <p>23 None of these are hallmarks of QAnon</p> <p>24 followers.</p>	<p style="text-align: right;">Page 237</p> <p>1 Section, you list essentially five, six</p> <p>2 inaccuracies in Mr. Rothschild's report, and</p> <p>3 I want to start with the bottom of Page 1.</p> <p>4 You say that "Mr. Roth-" -- that</p> <p>5 "Mr. Rothschild" cites -- "fails to cite any</p> <p>6 evidence for claim that Leslie and Jack were</p> <p>7 familiar with the phrase, "Where We Go One, We</p> <p>8 Go All."</p> <p>9 And, then, you say in your sworn</p> <p>10 deposition that, "Leslie Flynn states</p> <p>11 numerous times that she had no familiarity</p> <p>12 with the phrase, and that in taking the oath</p> <p>13 she was making a statement about family</p> <p>14 unity."</p> <p>15 Do you see that?</p> <p>16 A. I do.</p> <p>17 Q. Okay. And that's, again, based on</p> <p>18 what your -- was provided to you by Mr. Biss,</p> <p>19 right?</p> <p>20 A. Correct.</p> <p>21 Q. Okay. Did you see the tweets in</p> <p>22 which Leslie likes a bunch of tweets that say</p> <p>23 "WWG1WGA" before the 4th of July video?</p> <p>24 A. I -- I believe I did.</p>

<p style="text-align: right;">Page 238</p> <p>1 Q. Okay. And did you see that when 2 Leslie testified, she actually said that she 3 may have seen the phrase, "WWG1WGA," before 4 the 4th of July. She just didn't -- hadn't 5 repeated it. 6 Did you see that testimony? 7 MR. BISS: Object to -- object 8 to the form. Mischaracterizing 9 testimony. 10 MS. BOLGER: I'm reading it. 11 MR. BISS: Kate, it's wrong. 12 You read it -- 13 BY MS. BOLGER: 14 Q. I say, "Q" -- I was just about to 15 ask you when Steve jumped in, ironically, "I 16 was going to ask you: How it could be that 17 if you've never heard "WWG1WGA" before July 18 4, 2020, you could have seen it on May 9, 19 2020?" 20 And she responded, "I may have seen 21 it. I have never repeated it." 22 MR. BISS: Yeah, you're still 23 mischaracterizing it. 24 THE WITNESS: I also have a</p>	<p style="text-align: right;">Page 240</p> <p>1 BY MS. BOLGER: 2 Q. Okay. 3 A. -- or familiarity with it even. 4 Q. All right. 5 You -- you say -- you're 6 discrediting that evidence -- I hear you, but 7 it exists, right? 8 MR. BISS: Objection. 9 Objection to the form. 10 Mischaracterizes testimony, 11 deliberately and intentionally. 12 THE WITNESS: Evidence to 13 what? 14 BY MS. BOLGER: 15 Q. You say, "Mr. Rothschild fails to 16 cite any evidence for this claim." 17 And I'm telling you that in his 18 report -- 19 A. Yeah. 20 Q. -- Mr. Rothschild cites to tweets 21 liked by Leslie before July 4th of 2020 that 22 say, "WWG1WGA," and this one line from her 23 deposition testimony. 24 A. He actually doesn't cite it where</p>
<p style="text-align: right;">Page 239</p> <p>1 citation her where she says that 2 she has not seen it, or she's -- 3 BY MS. BOLGER: 4 Q. Right. 5 You're -- 6 A. "Where We Go One, We Go All." 7 Q. Right. 8 You're crediting this portion of 9 her testimony, right? 10 A. Yes. 11 Q. Okay. But there's the fact that 12 she liked "Where We Go One, We Go All" tweets 13 before July 4th, 2020, or this testimony that 14 says she may have seen it before July 4, 15 2020, are also parts of her testimony, right? 16 MR. BISS: Object to the form. 17 Mischaracterizes her testimony 18 totally, knowingly, and 19 deliberately. 20 THE WITNESS: Liking a tweet 21 that contains a hashtag does not 22 indicate understanding of what that 23 hashtag stands for -- 24</p>	<p style="text-align: right;">Page 241</p> <p>1 he says that she has familiarity. 2 Q. So it's the -- it's the existence 3 of the cite that -- 4 A. No. You're -- you're giving me a 5 double-barreled question, and I'm answering 6 the first part of it, that he doesn't cite 7 it. 8 And the second part of it is that 9 the existence of those tweets does not make 10 for evidence of her knowledge of what this 11 hashtag stood for. 12 Q. Right. 13 Isn't it the case that he had 14 evidence that he credited, and you had 15 evidence that you credited, rather than that 16 he had no evidence? 17 A. For this particular statement in 18 his report? Would you direct me in the 19 report where he credits it? I -- I 20 believe -- I -- I had the report in front of 21 me when I was writing the rebuttal. 22 Q. Yeah, I -- I -- I'm not -- I'm 23 actually not -- I'm not quibbling with you 24 about the word --</p>

<p style="text-align: right;">Page 242</p> <p>1 A. Okay.</p> <p>2 Q. -- about whether he cited it. I</p> <p>3 actually genuinely don't know --</p> <p>4 A. Okay.</p> <p>5 Q. -- as I sit here, what cite he put</p> <p>6 on the sentence.</p> <p>7 A. Okay.</p> <p>8 Q. I'm asking you, though, that you're</p> <p>9 saying he has no evidence, and I'm saying</p> <p>10 isn't it the case that he just chose to value</p> <p>11 different evidence than you?</p> <p>12 A. I didn't say he has no evidence. I</p> <p>13 said, "Mr. Rothschild fails to cite evidence</p> <p>14 for this claim."</p> <p>15 Q. Okay. So if he amended his report</p> <p>16 and put a citation in there, that cited just</p> <p>17 the two things I said to you, would you --</p> <p>18 A. Then I would not have that sentence</p> <p>19 in there, and, instead, I would continue to</p> <p>20 say that, "In her sworn deposition, Leslie</p> <p>21 Flynn states numerous times that she had no</p> <p>22 familiarity with the phrase."</p> <p>23 Q. So you disagree with his evidence,</p> <p>24 but it is not the case that he had no</p>	<p style="text-align: right;">Page 244</p> <p>1 Q. Do you dispute that they discussed</p> <p>2 how they wanted it to go viral?</p> <p>3 MR. BISS: Object to the form.</p> <p>4 THE WITNESS: As I recall it,</p> <p>5 if memory serves, they discussed it</p> <p>6 going viral after the video was</p> <p>7 already recorded the second time;</p> <p>8 in other words, I don't recall any</p> <p>9 discussion behind taking the second</p> <p>10 video as being for the purpose of</p> <p>11 the video going viral, if memory</p> <p>12 serves.</p> <p>13 BY MS. BOLGER:</p> <p>14 Q. Do you recall the testimony in</p> <p>15 which -- in which the witness testified --</p> <p>16 and I have to get the name -- a witness</p> <p>17 testified that they had done the second video</p> <p>18 because they wanted to make sure it was</p> <p>19 understandable?</p> <p>20 A. This is probably the -- maybe</p> <p>21 you're referencing the quote that I have in</p> <p>22 there.</p> <p>23 Q. I'm not.</p> <p>24 A. Then I don't know what you're</p>
<p style="text-align: right;">Page 243</p> <p>1 evidence, right?</p> <p>2 MR. BISS: Object to that</p> <p>3 form.</p> <p>4 THE WITNESS: I did not say</p> <p>5 that he had no evidence. I said he</p> <p>6 failed to cite evidence --</p> <p>7 BY MS. BOLGER:</p> <p>8 Q. Okay.</p> <p>9 A. -- if he had it.</p> <p>10 BY MS. BOLGER:</p> <p>11 Q. Okay. The next page --</p> <p>12 A. (Witness complies.)</p> <p>13 Q. -- you say, "Similarly, on Page 16</p> <p>14 of his report, Mr. Rothschild states that the</p> <p>15 second take of video was to, quote, 'make</p> <p>16 sure the video was perfect for a viral</p> <p>17 video.' There is no supporting evidence in</p> <p>18 Mr. Rothschild's report."</p> <p>19 Do you see that?</p> <p>20 A. I do.</p> <p>21 Q. Okay. Do you -- do you dispute</p> <p>22 that the Flynn took two versions of the</p> <p>23 video?</p> <p>24 A. I do not.</p>	<p style="text-align: right;">Page 245</p> <p>1 referring to.</p> <p>2 Q. Oh, no, that is what I'm saying,</p> <p>3 sorry. I apologize. I -- I have a different</p> <p>4 quote.</p> <p>5 Yes. So someone thought that</p> <p>6 they -- they could say the Constitution a</p> <p>7 little bit better, right?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. So you don't dispute that</p> <p>10 the video was taken twice, you don't dispute</p> <p>11 that it was taken because they thought they</p> <p>12 could state the Constitution a little better,</p> <p>13 you don't dispute that they then wanted it to</p> <p>14 go viral and said, "It's going to go viral,"</p> <p>15 and you don't dispute that they sat around</p> <p>16 and looked at it on the -- on the veranda,</p> <p>17 counting -- and looking at it on the veranda</p> <p>18 near the fire pit counting its viral hits,</p> <p>19 right?</p> <p>20 A. I don't dispute that.</p> <p>21 Q. Okay. So what is the part you</p> <p>22 dispute?</p> <p>23 A. Mr. Rothschild says that, "The</p> <p>24 second take of the video was to make sure the</p>

<p style="text-align: right;">Page 246</p> <p>1 video was perfect for a viral video." 2 It is part of his argument that 3 this video was intended to appeal in QAnon 4 followers in going viral. 5 Q. Oh, sorry. 6 Is it your actual testimony that 7 you think that the video was not intended to 8 appeal to QAnon followers? 9 A. I didn't see any evidence that it 10 was intended that way in either depositions. 11 Q. Right. 12 And even though it had #TakeTheOath 13 as part of the #TakeTheOath movement, you 14 don't think it wasn't intended to appeal to 15 QAnon people? 16 A. I don't know what the intention of 17 General Flynn was. I know that there was no 18 discussion about taking the second take in 19 order for it to go viral, according to 20 witness testimony. 21 Q. I'm sorry. 22 Do you dispute that the pho- -- 23 that the video was posted to appeal to QAnon 24 followers?</p>	<p style="text-align: right;">Page 248</p> <p>1 A. Yes. 2 Q. -- "General Flynn #TakeTheOath," 3 right? 4 A. Yes, he does. 5 Q. Okay. On the next page, 6 three-quarters of the way down, he himself 7 tweets "Happy Independence Day. WWG1WGA." 8 And it is a -- it is a -- it is a commentary 9 he -- he himself has added to the 10 General Flynn video -- video. 11 Do you see that? 12 A. "Happy Independence Day. WWG1-" -- 13 yeah. I -- I see it, yes. 14 Q. Okay. Great. 15 A. Yeah. 16 Q. So I'm saying -- I'm asking you: 17 When the Flynn family -- when General Flynn 18 posted the video on Twitter -- on Twitter 19 with the "#TakeTheOath," and, then, when 20 Jack Flynn re-posted it adding, "Where We Go 21 One, We Go All," do you genuinely believe 22 that that was not intended to call out to the 23 QAnon community? 24 A. Okay. What General Flynn did is</p>
<p style="text-align: right;">Page 247</p> <p>1 A. The video was posted by 2 General Flynn, right? 3 Q. And Jack Flynn, both of them. 4 MR. BISS: That was -- it 5 was -- it was re-tweeted by 6 Jack Flynn. 7 THE WITNESS: If it was 8 re-tweeted. 9 MR. BISS: Let's be honest. 10 THE WITNESS: You're 11 re-tweeting, right? 12 MR. BISS: Let's be honest. 13 BY MS. BOLGER: 14 Q. I'm looking at it. It's -- it's 15 Tab 38. It's actually not quite re-tweeted. 16 It's a little more than that. 17 So it's Tab 38, which I think was 18 421. 19 A. I have -- I have 421. 20 Q. Okay. So the -- Jack -- Jack Flynn 21 posted twice. 22 So on the -- Page 3 of 6 -- 23 A. Yes. 24 Q. -- he straight up re-tweets --</p>	<p style="text-align: right;">Page 249</p> <p>1 besides the point. I don't know. He might 2 have. He might not have. He has his own 3 dealings with the QAnon community. 4 Jack Flynn re-tweeted his brother's 5 tweet with him in the picture, and that's 6 enough reason for me. I don't have to dig 7 deeper for why he would re-tweet that. 8 Q. Why not. So what -- why is it 9 that -- and I -- I don't understand this. 10 Why is it that you can make a 11 conclusion -- you can think what is -- what 12 is the decision-making, the methodology 13 between "I'll buy this explanation rather 14 than this explanation"? 15 That's -- you're just picking one, 16 right? 17 A. Well, I feel like I'm picking a 18 more reasonable one. 19 Q. Why? 20 A. Why family support is a reasonable 21 explanation? 22 Q. No. You're picking it as the -- 23 the dominant explanation, not -- you're 24 not -- it's not, like, in the bucket.</p>

<p style="text-align: right;">Page 250</p> <p>1 Sure, it could be in the bucket, 2 but you've isolated it as "the reason," and I 3 want to know -- 4 A. Not only, no. I have other 5 reasonable explanations, like, for example, 6 donations to the Defense Fund. To me, that's 7 a very reasonable explanation. It doesn't 8 require any other additional ones. 9 Q. Right. 10 But it doesn't preclude additional 11 ones. 12 A. But -- 13 Q. You're picking one. You're not -- 14 you're ignoring the others. 15 You're just picking one, right? 16 A. Yeah. I'm picking one that makes 17 more sense to me. 18 Q. Right. 19 But what Rothschild -- what 20 Mr. Rothschild said was that there's -- 21 reasonable to conclude that Jack and Leslie 22 Flynn were either signifying that they were 23 QAnon followers, or were comfortable being 24 associated with QAnon.</p>	<p style="text-align: right;">Page 252</p> <p>1 Oath." And, then, Jack Flynn adds, "Where We 2 Go One, We Go All." 3 That's not a family thing. He's 4 tweeting out, "Where We Go One, We Go All." 5 MR. BISS: Objection. 6 Argumentative. 7 THE WITNESS: To him -- 8 MR. BISS: It is too a family 9 thing. 10 THE WITNESS: To him, it is a 11 family thing as he testified, and, 12 so, did his wife. To him, it is a 13 family thing. 14 So you -- you have a circular, 15 like, a looping logic here that, 16 you know, it must have been that 17 that he knew what it was because he 18 tweeted it to explain what he did 19 before he tweeted it. 20 But if he didn't know then, 21 his tweet later would indicate the 22 same lack of knowledge. 23 BY MS. BOLGER: 24 Q. Okay. You genuinely believe that</p>
<p style="text-align: right;">Page 251</p> <p>1 And you just said, saying that they 2 wanted to get money is okay, well, that's 3 because they were being associated with 4 QAnon, right? 5 A. No. 6 Q. Well, where's the -- where's the 7 request for money in these? 8 A. No. This one is not that. This 9 one is family, right, they're all together as 10 a big happy family celebrating the dismissal 11 of charges against General Flynn. 12 Q. Where does it say that? 13 A. Where does it say what? 14 Q. In that -- in these tweets, where 15 does it say that? 16 A. That they're all as a family 17 together here -- 18 Q. Just celebrating -- 19 A. -- the picture says that. 20 Q. Well, no, the -- the picture says, 21 "Take The Oath," as Big Moose, my favorite 22 Tweeter who says, "Take The oath," as do 23 Barbara Flynn who says, "Take The Oath." 24 All of these people say, "Take The</p>	<p style="text-align: right;">Page 253</p> <p>1 Jack Flynn, on July 4th, 2020, did not know 2 what "Where We Go One, We Go All" means, 3 despite the fact that he had consistently 4 tweeted out -- tweeted it out over and over 5 again for a period of months before that, and 6 for a period of months afterwards? 7 A. That he didn't -- 8 MR. BISS: Object to the form. 9 THE WITNESS: That he didn't 10 know that this was a QAnon 11 statement? 12 BY MS. BOLGER: 13 Q. Yes. 14 A. I believe that. 15 Q. Based on what? 16 A. Based on his lack of familiarity 17 with QAnon that he expressed publicly -- 18 publicly several times in his tweets, not 19 re-tweets, his tweets. 20 Q. Never had the slightest desire to 21 tweet anything -- 22 A. Is it okay for you to interrupt 23 though? 24 Q. I'm sorry, I thought you were done</p>

<p style="text-align: right;">Page 254</p> <p>1 actually.</p> <p>2 A. I was not.</p> <p>3 MR. BISS: No, you interrupted</p> <p>4 her, Kate.</p> <p>5 Q. You can keep going. I didn't -- I</p> <p>6 thought you were done.</p> <p>7 A. No.</p> <p>8 So he expressed --based on his</p> <p>9 expressed lack of knowledge of QAnon, based</p> <p>10 on his expressed disassociation with QAnon in</p> <p>11 his private communications, based on his lack</p> <p>12 of public support, or private support for any</p> <p>13 of QAnon conspiracy theories, based on all of</p> <p>14 that I believe that his statements in</p> <p>15 depositions are consistent with that, and</p> <p>16 that they're true and that he didn't actually</p> <p>17 know the link between the phrase and QAnon</p> <p>18 movement, and what it might signify for</p> <p>19 somebody who was familiar with a QAnon</p> <p>20 movement and supported the QAnon conspiracy</p> <p>21 theories, and knew of Q-drops and what they</p> <p>22 meant.</p> <p>23 Q. So for a period of months, he just</p> <p>24 accidently tweeted out things that so</p>	<p style="text-align: right;">Page 256</p> <p>1 A. Is there evidence that he read</p> <p>2 those newspaper articles?</p> <p>3 Q. There certainly is. During his</p> <p>4 deposition testimony, if you want to go back</p> <p>5 and look at it. He totally knew what was</p> <p>6 happening. He didn't take it down. He</p> <p>7 didn't stop using it. He didn't change it.</p> <p>8 How do you square that with your</p> <p>9 idea that he was pellucidly ignorant for</p> <p>10 months on end?</p> <p>11 A. I am not sure why he didn't take it</p> <p>12 down. That's a separate question for -- from</p> <p>13 the one that you were asking me just a second</p> <p>14 ago, which is why he tweeted it.</p> <p>15 Q. How can you say that after someone</p> <p>16 has tweeted out "Where We Go One, We Go All,"</p> <p>17 there are newspaper articles about his</p> <p>18 statement, "Where We Go One, We Go All," that</p> <p>19 called it a QAnon oath, and, then, he</p> <p>20 continues to tweet about it for months and</p> <p>21 months and months, how can you sit here and</p> <p>22 say he didn't know it was a QAnon oath, at</p> <p>23 least from the time of the 4th of July -- you</p> <p>24 -- even if you accepted beforehand, which I</p>
<p style="text-align: right;">Page 255</p> <p>1 happened to be connected to the QAnon</p> <p>2 movement?</p> <p>3 A. If he didn't know --</p> <p>4 MR. BISS: Object to the form.</p> <p>5 Argumentative.</p> <p>6 THE WITNESS: -- he didn't</p> <p>7 know. You know, for years I</p> <p>8 thought "mirror" was spelled with a</p> <p>9 "W" at the end. And I just went on</p> <p>10 spelling it wrong again and again.</p> <p>11 This was before spellchecks.</p> <p>12 If you don't know, you just</p> <p>13 keep on not knowing until someone</p> <p>14 educates you.</p> <p>15 BY MS. BOLGER:</p> <p>16 Q. There was a newspaper article that</p> <p>17 says, "This is a QAnon phrase," and he kept</p> <p>18 tweeting it out after that.</p> <p>19 There were tons of newspaper</p> <p>20 articles right after this came out that said,</p> <p>21 "Where We Go One" is a QAnon oath, and</p> <p>22 Jack Flynn tweeted it out for months and</p> <p>23 months and months and months and months and</p> <p>24 months after that, so --</p>	<p style="text-align: right;">Page 257</p> <p>1 don't, but even if you accept it beforehand,</p> <p>2 from the minute those newspaper articles came</p> <p>3 out Jack Flynn knew "Where We Go One, We Go</p> <p>4 All" was a QAnon oath, and he kept tweeting</p> <p>5 it?</p> <p>6 MR. BISS: Object to the form.</p> <p>7 Argumentative.</p> <p>8 BY MS. BOLGER:</p> <p>9 Q. How do you square that with your</p> <p>10 saying he didn't know what it meant?</p> <p>11 MR. BISS: Object to the form.</p> <p>12 Argumentative.</p> <p>13 THE WITNESS: I -- I'm sorry.</p> <p>14 You're now switching again, and</p> <p>15 I'm -- I'm -- I just can't keep up.</p> <p>16 I'm sorry.</p> <p>17 You said before your objection</p> <p>18 to the -- him was that he didn't</p> <p>19 take it down.</p> <p>20 BY MS. BOLGER:</p> <p>21 Q. No, I've -- I'm not changing. I'm</p> <p>22 being very clear.</p> <p>23 You just testified that you think</p> <p>24 Jack Flynn never knew what "Where We Go One,</p>

<p style="text-align: right;">Page 258</p> <p>1 We Go All" was. He never knew it was part of 2 the QAnon oath. And I'm telling you -- 3 A. I didn't say never. I said that I 4 believe up until the July 4th video and 5 during that July 4th video, I believe that, 6 to him, "Where We Go One, We Go All" meant 7 something about family unity. 8 Q. Okay. So you know the CNN 9 report -- 10 A. He probably knows now, so... 11 Q. You know the CNN report at issue in 12 this lawsuit is not from the 4th of July, 13 right, it's from February of 2021, right? 14 A. Okay. 15 Q. So between July 4th and, actually, 16 September 1st of 2020, Jack Flynn went on a 17 tweet storm, in which he talked about QAnon. 18 He tweeted out "#WWG1WGA," all that. 19 So "What The Fuck WWG1WGA," after 20 this, right? 21 A. Yeah. 22 Q. So how can you sit here and say at 23 the time that he was sending this stuff into 24 the air he didn't know which it had a QAnon</p>	<p style="text-align: right;">Page 260</p> <p>1 Q. Okay. And "Where We Go One, We Go 2 All," you agreed with me has had no meaning 3 other than at the -- in July 4th 2020 had no 4 other meaning, other than the movie "The 5 White Squall" and the QAnon movement? 6 A. That's actually untrue. 7 MR. BISS: She didn't -- 8 THE WITNESS: I did not say 9 that. 10 MR. BISS: Yeah, she didn't 11 say that. 12 THE WITNESS: That's 13 actually -- that's basically 14 untrue. 15 MR. BISS: Yeah. 16 THE WITNESS: I have not -- 17 BY MS. BOLGER: 18 Q. That's exactly what you said -- 19 MR. BISS: No, it's not. 20 BY MS. BOLGER: 21 Q. -- for that moment in time, for 22 July 4, 2020 -- 23 MR. BISS: Absolutely not. 24</p>
<p style="text-align: right;">Page 259</p> <p>1 meaning? 2 MR. BISS: Object to the form. 3 Argumentative. 4 BY MS. BOLGER: 5 Q. He knew. 6 In August of 2020, he knew, right? 7 A. I actually -- 8 MR. BISS: Object to the form. 9 Argumentative. 10 THE WITNESS: I don't know. I 11 don't know whether he knew or not. 12 BY MS. BOLGER: 13 Q. Well, why are you -- 14 A. Just because there were -- 15 Q. -- willing to accept that he 16 didn't? 17 A. Because I have no evidence to the 18 contrary. 19 Q. Well, he's alive in the world, 20 right? 21 A. Yes. 22 Q. Right. 23 The words have meaning, right? 24 A. Yes.</p>	<p style="text-align: right;">Page 261</p> <p>1 BY MS. BOLGER: 2 Q. It's not true for now, but it's 3 what you said -- 4 MR. BISS: You are absolutely 5 mischaracter- -- 6 BY MS. BOLGER: 7 Q. Well, then correct me. 8 THE COURT REPORTER: I can't 9 -- I can't take down everybody 10 yelling at the same time. 11 BY MS. BOLGER: 12 Q. Then -- then go ahead and correct 13 me. 14 A. I am correcting you. 15 I did say that. 16 MR. BISS: She shouldn't have 17 to correct you. 18 THE WITNESS: And I did not 19 believe that. 20 BY MS. BOLGER: 21 Q. So what is it? 22 A. And I said, in fact, that chances 23 are out there in the world there's somebody 24 who's using it for the purpose other than</p>

<p style="text-align: right;">Page 262</p> <p>1 QAnon, so I would never think that there was 2 no other use of it. 3 And I actually specifically said 4 that there is an intrinsic meaning in the 5 phrase, something that you said I -- I agreed 6 that there isn't. 7 I don't agree with that. There is 8 a meaning in the phrase, and the phrase is 9 appealing and there's a reason to use that 10 just for those two reasons; that it sounds 11 good, and there's a meaning that some people 12 would resonate with. 13 Q. And there's a meaning behind 14 "WWG1WGA"? It's taken me months to figure 15 out how to say that actually. 16 It's really awkward, right? 17 A. It's -- it's a hashtag. Hashtags 18 are not beautiful. They're just a shortened 19 version -- 20 Q. But there's nothing really 21 evocative that hails your heart out when you 22 read "WWG1WGA," right? 23 A. It's a caption of the phrase, 24 right, so, presumably, when you see that in</p>	<p style="text-align: right;">Page 264</p> <p>1 BY MS. BOLGER: 2 Q. Well, this is it -- 3 A. -- that I said them a certain way. 4 Q. This is a -- this is a deposition, 5 so I'm allowed to ask you hypothetically. 6 MR. BISS: Well, but you're 7 not allowed to steer. 8 BY MS. BOLGER: 9 Q. Hypothetical -- 10 MR. BISS: That's what you're 11 not allowed to do. 12 BY MS. BOLGER: 13 Q. If hypothetically -- 14 A. Okay. 15 Q. -- if you go back and look at Jack 16 Flynn's deposition transcript -- 17 A. Yes. 18 Q. -- and you find out, as you will, 19 that he was aware that there were newspaper 20 articles published about that oath would call 21 it a QAnon slogan? 22 A. Okay. 23 Q. And you then look at his Twitter 24 feed and you "Where We Go One, We Go All"</p>
<p style="text-align: right;">Page 263</p> <p>1 your mind, you're thinking of a phrase. 2 Q. You know -- 3 A. I don't know. I don't use 4 hashtags. 5 Q. Right. 6 What you are saying is that you 7 believe, as you sit here, that Mr. Flynn 8 didn't know that "Where We Go One, We Go All" 9 was a QAnon phrase. 10 And I am asking you: How can you 11 possibly square that with the many, many, 12 many newspaper articles that Jack Flynn 13 testified he was aware of that said they used 14 a QAnon phrase? 15 MR. BISS: Object to the form. 16 THE WITNESS: I don't know 17 whether he knew or not. 18 Okay. I don't know. I have 19 to go back to his deposition and -- 20 and -- and look at exactly what he 21 said, because sometimes you 22 misstate things, even that I said, 23 and I know -- 24</p>	<p style="text-align: right;">Page 265</p> <p>1 used repeatedly thereafter -- 2 A. Yes. 3 Q. -- how can possibly say that he 4 didn't know what it meant? 5 MR. BISS: Are you lying, or 6 are you telling her the truth? Is 7 the -- is the premise of your 8 question truthful, or are you 9 lying? 10 BY MS. BOLGER: 11 Q. Can you answer my question, please? 12 MR. BISS: How can -- how can 13 she answer it? She doesn't know. 14 BY MS. BOLGER: 15 Q. It's a hypothetical question. 16 You can answer it. 17 A. Your question is: How I can sit 18 here? I don't know how to answer that 19 question, how I can sit here. I'm just 20 sitting here, okay. 21 If you want to ask me, like, a 22 slightly different version, I will be happy 23 to answer. 24 Q. You can answer the question. You</p>

<p style="text-align: right;">Page 266</p> <p>1 can answer the question: How can you 2 possibly say that someone who knows on 3 July 4, 2020 what "Where We Go One, We Go 4 All" means doesn't know what it means in 5 August of 2020? 6 MR. BISS: Object to the form. 7 THE WITNESS: I -- okay. 8 BY MS. BOLGER: 9 Q. I'll do it again. 10 A. Okay. 11 Q. You're going to go back and look at 12 Mr. Flynn's deposition transcript -- 13 A. Okay. 14 Q. -- and you're going to discover 15 that he was aware that there were newspaper 16 articles after the 4th of July that said, 17 "Where We Go One" -- 18 A. Yes. 19 Q. -- "We Go All" was a QAnon slogan. 20 So in light of that hypothetical, 21 that -- that is what happens -- 22 A. Yes. 23 Q. -- what possibly basis could there 24 be for saying he doesn't -- didn't know what</p>	<p style="text-align: right;">Page 268</p> <p>1 read. 2 But, hypothetically, if he does not 3 believe that media -- the media are fairly 4 representing his brother and him, especially 5 in the aftermath of, you know, the CNN 6 report, then his knowing of -- 7 Q. Which CNN report? 8 A. -- how -- 9 Q. Which CNN report? 10 A. The CNN report that labeled his 11 family as QAnon followers. 12 Q. There was no such CNN report, but 13 there were two CNN reports. There was one on 14 the 4th of July -- 15 MR. BISS: You're just arguing 16 with her. 17 BY MS. BOLGER: 18 Q. I'm just -- I need to know what 19 you're talking about when you talk about a 20 CNN report. 21 MR. BISS: You're just arguing 22 with her. 23 BY MS. BOLGER: 24 Q. Was the 4th of July CNN report that</p>
<p style="text-align: right;">Page 267</p> <p>1 it meant in August of 2020, or September of 2 2020 -- 3 A. Okay. 4 Q. -- or December of 2020? 5 A. Okay. Supposing there is such 6 evidence in a deposition, as you described, 7 then, he had knowledge of these newspapers 8 connecting the slogan with QAnon movement in 9 these publications that came out after the 10 phrase. And, then, he knew that people 11 somewhere out there who were QAnon followers 12 were using this phrase, right? 13 Q. And that he was perceived as one of 14 them. 15 A. By the media that he does not think 16 are being fair, right? So that -- you know, 17 like -- 18 Q. Well, I don't -- if -- if you don't 19 know he testified that way, you can't tell me 20 he didn't think they weren't being fair, 21 right? 22 A. No. I -- I -- I think -- I think, 23 you know, he expressed some sentiments like 24 that in -- in -- in some of the materials I</p>	<p style="text-align: right;">Page 269</p> <p>1 was in Mia's slide -- 2 A. Yes. 3 Q. -- that said it was a QAnon slogan. 4 A. Mm-humm. 5 Q. And, then, there was the Q- -- a 6 CNN report at issue in this litigation, which 7 was Jan- -- was February of 2021, right, so 8 they're separated by six months? 9 MR. BISS: Kate -- Kate, I've 10 got to call you out on this one. 11 BY MS. BOLGER: 12 Q. So there's a flurry -- 13 MR. BISS: Sorry. This lie 14 has got to -- this lie -- this lie 15 has got to be called out. 16 MS. BOLGER: Hey, Steve -- 17 Steve, you've got to stop calling 18 me a liar. 19 MR. BISS: Now, you just 20 represented for the record that 21 Mia's slide -- Mia's slide referred 22 to the CNN report at issue in this 23 case. 24 MS. BOLGER: It did.</p>

<p style="text-align: right;">Page 270</p> <p>1 MR. BISS: And I -- I got to</p> <p>2 call you out --</p> <p>3 MS. BOLGER: No, I didn't. I</p> <p>4 said, "the 4th of July."</p> <p>5 MR. BISS: I have to call you</p> <p>6 out on this lie.</p> <p>7 MS. BOLGER: Hey, Steven,</p> <p>8 you're wrong. Mia's slide refers</p> <p>9 to --</p> <p>10 MR. BISS: I can't let all the</p> <p>11 lies go by, I'm sorry.</p> <p>12 MS. BOLGER: Mia's slide</p> <p>13 refers --</p> <p>14 THE COURT REPORTER: I</p> <p>15 can't -- I can't do this.</p> <p>16 MS. BOLGER: Yeah, sorry.</p> <p>17 Mia's slide refers to the 4th</p> <p>18 of July report, which is what I</p> <p>19 think I said, but I'm happy to have</p> <p>20 you look at it. It's right there.</p> <p>21 Mia -- Mia's slide refers to</p> <p>22 the 4th of July CNN report.</p> <p>23 MR. BISS: Well, yeah, so</p> <p>24 that's not what you said</p>	<p style="text-align: right;">Page 272</p> <p>1 MR. BISS: You didn't. You</p> <p>2 lied, and, now -- and, then, we</p> <p>3 caught you, and, now, you're</p> <p>4 telling -- now, you're telling the</p> <p>5 truth.</p> <p>6 BY MS. BOLGER:</p> <p>7 Q. The February 2021 report, which is</p> <p>8 at issue in this lawsuit, is six months</p> <p>9 later, right? So the -- immediately after</p> <p>10 the 4th of July, there's a bunch of newspaper</p> <p>11 articles that say, "Where We Go One, We Go</p> <p>12 All," is the QAnon oath that Michael Flynn</p> <p>13 and his family took.</p> <p>14 Mr. Flynn testified that he saw</p> <p>15 that.</p> <p>16 A. Okay.</p> <p>17 Q. I'm asking you --</p> <p>18 A. Yeah.</p> <p>19 Q. -- how you could say that in</p> <p>20 February 2021, he didn't know that "Where We</p> <p>21 Go One, We Go All" was the QAnon slogan, if</p> <p>22 it had been widely reported in media, and he</p> <p>23 testified he was aware of that?</p> <p>24 A. If he testified he was aware, he</p>
<p style="text-align: right;">Page 271</p> <p>1 originally.</p> <p>2 What you said is that Mia's</p> <p>3 slide referred to the CNN</p> <p>4 February 4, 2021 report.</p> <p>5 MS. BOLGER: I didn't --</p> <p>6 MR. BISS: Now you're -- now</p> <p>7 you're backtracking.</p> <p>8 MS. BOLGER: I didn't, Steve,</p> <p>9 but it's fine.</p> <p>10 MR. BISS: All right.</p> <p>11 MS. BOLGER: The -- the --</p> <p>12 Mia's --</p> <p>13 MR. BISS: So you're back --</p> <p>14 BY MS. BOLGER:</p> <p>15 Q. -- slide says that it's the 4th of</p> <p>16 July report has -- the Marshall Cohen</p> <p>17 article, which was published on the -- on</p> <p>18 July 5th --</p> <p>19 MR. BISS: There you go.</p> <p>20 MS. BOLGER: -- that talks</p> <p>21 about the 4th of July article.</p> <p>22 MR. BISS: There's the truth.</p> <p>23 MS. BOLGER: I told you the</p> <p>24 truth.</p>	<p style="text-align: right;">Page 273</p> <p>1 was aware of the fact. What is the question?</p> <p>2 He was aware of the fact.</p> <p>3 Q. Well, then, how can you say that</p> <p>4 his continued use of the phrase wasn't</p> <p>5 affiliated with QAnon?</p> <p>6 A. You want me to answer that</p> <p>7 question?</p> <p>8 Q. Yes. How could -- if you he knew</p> <p>9 it was associated with -- with QAnon --</p> <p>10 A. Yeah.</p> <p>11 Q. -- and he kept using it, how -- how</p> <p>12 can your position be that it was just a</p> <p>13 family slogan?</p> <p>14 A. If he continues to believe that to</p> <p>15 him it's a family slogan, and he's entrenched</p> <p>16 in his belief, as a lot of people are, he</p> <p>17 will do it in order to, you know, make it</p> <p>18 stronger. Sometimes people just keep</p> <p>19 repeating things, because they believe in</p> <p>20 them.</p> <p>21 Q. But how could he reasonably have</p> <p>22 expected anybody else in the universe to have</p> <p>23 understood him to be making a family motto</p> <p>24 when it was a slogan that he knew had been</p>

<p style="text-align: right;">Page 274</p> <p>1 called a QAnon slogan?</p> <p>2 MR. BISS: Object to the form.</p> <p>3 THE WITNESS: But I don't know</p> <p>4 what he reasonably believed about</p> <p>5 other people. I don't know who</p> <p>6 his, you know, friends and family</p> <p>7 are, and what they believe and what</p> <p>8 he -- what he might expect of them.</p> <p>9 I know, you know, when I tweet</p> <p>10 something, I have a certain</p> <p>11 anticipation based on who -- people</p> <p>12 who watch my Twitter are.</p> <p>13 And when Mike Rothschild</p> <p>14 tweets something, he knows that</p> <p>15 there's -- just a few days ago I</p> <p>16 followed Mike Rothschild.</p> <p>17 He tweeted something about</p> <p>18 there's going to be a nuclear war</p> <p>19 in the next brief amount of time, I</p> <p>20 forget, and something, something.</p> <p>21 And because people who follow</p> <p>22 Mike Rothschild know Mike</p> <p>23 Rothschild, and I do, too, I know</p> <p>24 that he doesn't actually mean that.</p>	<p style="text-align: right;">Page 276</p> <p>1 You have no understanding --</p> <p>2 A. Yeah.</p> <p>3 Q. -- of who his followers were.</p> <p>4 Okay. Back to his rebuttal -- I'm</p> <p>5 sorry, your rebuttal.</p> <p>6 On Page 20 of his report,</p> <p>7 Mr. Rothschild states, "Jack and Leslie Flynn</p> <p>8 promoted the legal defense fund using digital</p> <p>9 soldiers and "Where We Go One, We Go All"</p> <p>10 when possible.</p> <p>11 You say Mr. Rothschild fails to</p> <p>12 provide evidence for this claim, right?</p> <p>13 A. Probably.</p> <p>14 - - -</p> <p>15 (Whereupon, Exhibit-428,</p> <p>16 Re-tweet from Jack Flynn, Dated</p> <p>17 12/23/20, was marked for</p> <p>18 identification.)</p> <p>19 - - -</p> <p>20 BY MS. BOLGER:</p> <p>21 Q. Okay. But he does provide evidence</p> <p>22 of that. For example -- this is Exhibit-428,</p> <p>23 and it is a re-tweet from Jack Flynn, dated</p> <p>24 December 23rd, 2020.</p>
<p style="text-align: right;">Page 275</p> <p>1 That is sarcastic.</p> <p>2 So his anticipation was based</p> <p>3 on his followers knowing that, you</p> <p>4 know, this is an incident of</p> <p>5 sarcasm. But if you don't know who</p> <p>6 he is and you go and you read that</p> <p>7 and you read responses to that --</p> <p>8 to that from his followers, it</p> <p>9 looks like he's running an</p> <p>10 apocalyptic cult, because they're</p> <p>11 all saying, "Yes, Mike, thank you.</p> <p>12 Just keep" -- you know, "keep</p> <p>13 letting us know when the world is</p> <p>14 going to end."</p> <p>15 It's all sarcasm, and it's</p> <p>16 understood by people who follow</p> <p>17 Mike -- Mike Rothschild.</p> <p>18 BY MS. BOLGER:</p> <p>19 Q. There -- is it your testimony that</p> <p>20 Jack Flynn's followers were not QAnon</p> <p>21 supporters?</p> <p>22 A. I have no understanding of who his</p> <p>23 followers were.</p> <p>24 Q. Right. I agree.</p>	<p style="text-align: right;">Page 277</p> <p>1 So this is a -- Jack Flynn</p> <p>2 re-tweeting someone saying, "I received my</p> <p>3 hoodie and camo hat, as well as a WWG1WGA</p> <p>4 T-shirt, super comfy and extremely well made.</p> <p>5 Benefits The General Flynn Defense Fund. Lot</p> <p>6 of good stuff. Check it out."</p> <p>7 And it has a link. So it's</p> <p>8 promoting -- what are the words -- he's</p> <p>9 promoting the legal defense fund using</p> <p>10 digital soldiers and "Where We Go One, We Go</p> <p>11 All," when possible, right?</p> <p>12 A. I'm sorry, I'm still trying to find</p> <p>13 the statement on Rothschild's report that you</p> <p>14 first referred to.</p> <p>15 Q. Well, I was looking at your report,</p> <p>16 so your report --</p> <p>17 A. Yes. I see on Page 20.</p> <p>18 Q. Okay. Right. Okay.</p> <p>19 A. Now, I'm -- looking at --</p> <p>20 Q. Sorry.</p> <p>21 A. Now, I'm looking at --</p> <p>22 Q. Right. Sorry.</p> <p>23 A. -- where he says this, General</p> <p>24 Jack and Leslie Flynn -- "and Jack and Leslie</p>

<p style="text-align: right;">Page 278</p> <p>1 Flynn promoted the legal defense fund using 2 digital soldiers and" -- blah, blah, blah -- 3 "when possible." 4 Q. So why is that -- what is this 5 document, in which Jack Flynn promotes the 6 Legal Defense Fund, and "Where We Go One, We 7 Go All" not evidence at that point? 8 A. I didn't say it wasn't. I said 9 that Mike Rothschild's report does not refer 10 to it. I didn't say it wasn't evidence. I 11 said that Mr. -- 12 Q. Okay. Well, now there's evidence. 13 A. Okay. 14 Q. So does this change your analysis 15 of Mr. Rothschild's report? 16 A. No. My analysis is it failed to 17 provide claims it made. That's the analysis. 18 And I stick it with because, look, there's no 19 evidence here. 20 Q. Well, there's no citation there. 21 A. Yeah, that's evidence. 22 Q. Okay. Take a look at the next one 23 of your paragraphs. 24 A. (Witness complies.)</p>	<p style="text-align: right;">Page 280</p> <p>1 MR. BISS: It doesn't mean he 2 was involved in it, which he 3 wasn't. 4 THE WITNESS: Okay. That's 5 fine. 6 But Mr. Rothschild says, "Jack 7 and Leslie Flynn promote." 8 Is there evidence to suggest 9 that Leslie Flynn promoted the 10 legal defense fund using these 11 signifiers that Mr. Rothschild is 12 referencing? 13 BY MS. BOLGER: 14 Q. Well, I'm asking you if this 15 document that you're holding in your hand is 16 evidence of Jack Flynn promoting the legal 17 defense fund by use of "Where We Go One, We 18 Go All"? That's my question. 19 MR. BISS: Kate, she asked a 20 question. Is there any evidence? 21 She asked you that question. 22 MS. BOLGER: This is a one-way 23 dialogue, I'm sorry. 24 MR. BISS: Yeah,</p>
<p style="text-align: right;">Page 279</p> <p>1 Q. Sorry. 2 This is evidence, though, of it, 3 right? 4 A. It's evidence of Jack Flynn 5 re-tweeting it. It's not evidence of Leslie 6 Flynn, who testified, and I quote from 7 deposition, that "she was not at all involved 8 with the legal defense fund." 9 Q. Right. 10 A. Is there evidence to dispute that? 11 Q. And she says -- I say, "Was your 12 husband involved?" 13 And she says, "No." 14 And we know that's not right, 15 right? 16 MR. BISS: Object to the form. 17 She wasn't involved in the legal 18 defense fund, and you know it. 19 BY MS. BOLGER: 20 Q. Actually, there's an email, which 21 Mr. Biss may or may not have provided to you, 22 in which Jack Flynn suggests the idea of 23 setting up the legal -- the legal defense 24 fund.</p>	<p style="text-align: right;">Page 281</p> <p>1 unfortunately. 2 BY MS. BOLGER: 3 Q. You get to answer the question. 4 A. Okay. Mr. Rothschild makes a 5 compounded statement. You provided evidence 6 for a piece of it, I agree. 7 Q. Again -- 8 A. Is there evidence to support the 9 other half of that statement on Leslie Flynn? 10 Q. Again, this is not a dialogue. 11 Okay. So -- 12 MR. BISS: That means no. 13 BY MS. BOLGER: 14 Q. Okay. So the next paragraph, 15 Paragraph 4 -- 16 MR. BISS: That means the 17 answer is, no, we don't have any 18 evidence. 19 BY MS. BOLGER: 20 Q. The next one down says -- on 21 Page -- 22 MR. BISS: She's 23 misrepresented -- 24</p>

<p style="text-align: right;">Page 282</p> <p>1 BY MS. BOLGER:</p> <p>2 Q. No. On page -- oh, 25 writes,</p> <p>3 "Over the course of 2019 and 2020, Jack</p> <p>4 consistently boosted conspiracy theories</p> <p>5 embraced by QAnon."</p> <p>6 And you say that's incorrect,</p> <p>7 right?</p> <p>8 A. Em, let's see. Right.</p> <p>9 Here, Mr. Rothschild does provide</p> <p>10 citation, which is this web archive. And I</p> <p>11 went on that web archive and I didn't see any</p> <p>12 evidence of Jack Flynn stating that he</p> <p>13 believed any of QAnon conspiracy theories,</p> <p>14 which, according to Mr. Rothschild, he was</p> <p>15 consistently boosting.</p> <p>16 Q. Okay. So, actually, the full</p> <p>17 sentence -- because you truncated the</p> <p>18 sentence, right, the full sentence that</p> <p>19 Rothschild says is, "For example, over the</p> <p>20 course of 2019 and 2020, Jack consistently</p> <p>21 used QAnon hashtags, boosted conspiracy</p> <p>22 theories embraced by QAnon, shared materials</p> <p>23 directly referencing Q-drops, and, in</p> <p>24 particular, the phrase, "Where We Go One, We</p>	<p style="text-align: right;">Page 284</p> <p>1 MR. BISS: Object to the form.</p> <p>2 THE WITNESS: I would disagree</p> <p>3 with consistency, because you would</p> <p>4 have to look at the entirety of his</p> <p>5 Twitter feed and how consistently</p> <p>6 those hashtags were used.</p> <p>7 I would -- I would suggest</p> <p>8 that he did use them on more one</p> <p>9 than one occasion. Consistency,</p> <p>10 though, requires an analysis that I</p> <p>11 wasn't able to -- to perform.</p> <p>12 Q. So the only thing you're -- you</p> <p>13 think is wrong in that sentence is the</p> <p>14 boosted conspiracy theories?</p> <p>15 A. Let's see. He did use the phrase:</p> <p>16 "Where We Go One, We Go All," or the</p> <p>17 abbreviation, which is actually in dispute in</p> <p>18 this case, so it cannot be used as evidence</p> <p>19 for itself.</p> <p>20 Q. That he used it is not in dispute?</p> <p>21 A. No. That it provides evidence for</p> <p>22 him being a QAnon follower.</p> <p>23 Q. So the sentence that Mr. Rothschild</p> <p>24 wrote is, "Over the course of 2019 and 2020,</p>
<p style="text-align: right;">Page 283</p> <p>1 Go All" or its abbreviation, "Where We Go</p> <p>2 One, We Go All."</p> <p>3 So that -- that is what Mr. --</p> <p>4 Mr. Rothschild said. Mr. Rothschild didn't</p> <p>5 say the truncated sentence. Your -- your</p> <p>6 three ellipses took out the rest or</p> <p>7 Mr. Rothschild's sentence, right?</p> <p>8 A. Right. And this part -- this part</p> <p>9 of his sentence has no evidence to support</p> <p>10 it. That's what I was referencing.</p> <p>11 The -- the part of his statement</p> <p>12 that says that, "Jack Flynn consistently</p> <p>13 boosted conspiracy theories embraced by</p> <p>14 QAnon," is not supported by facts in this</p> <p>15 case.</p> <p>16 Q. Okay. Well, put a -- put a pin in</p> <p>17 that for a second.</p> <p>18 Do you agree with me, then, that</p> <p>19 Jack Flynn consistently used QAnon hashtags,</p> <p>20 shared material directly referencing Q-drops,</p> <p>21 and, in particular, "Where We Go One, We Go</p> <p>22 All," or its abbreviation, "Where We Go One,</p> <p>23 We Go All," so that part of Mr. Rothschild's</p> <p>24 sentence you think is accurate?</p>	<p style="text-align: right;">Page 285</p> <p>1 Jack consistently used QAnon hashtags,</p> <p>2 boosted conspiracies and phrases by QAnon,</p> <p>3 shared material directly referencing Q-drops,</p> <p>4 and, in particular, the phrase, "Where We Go</p> <p>5 One, We Go All," or its abbreviation, "Where</p> <p>6 We Go One, We Go All"?</p> <p>7 A. Yeah.</p> <p>8 Q. Okay. I take it you don't disagree</p> <p>9 that he shared material referencing Q-drops,</p> <p>10 because you haven't mentioned that?</p> <p>11 A. I don't disagree with that.</p> <p>12 Q. Okay. And you can't disagree that</p> <p>13 he used the phrase, "Where We Go One, We Go</p> <p>14 All," or its abbreviation, "Where We Go" --</p> <p>15 "WWG1WGA"?</p> <p>16 A. I don't disagree with that.</p> <p>17 Q. Okay.</p> <p>18 A. I disagree with it being used as</p> <p>19 basis for an opinion of whether his use of</p> <p>20 that phrase in that video indicated that he</p> <p>21 was QAnon follower. This is --</p> <p>22 Q. Sorry. What is the -- what is the</p> <p>23 thing?</p> <p>24 So in your report you say that</p>

<p style="text-align: right;">Page 286</p> <p>1 there is no evidence for this sentence.</p> <p>2 A. There's no evidence for the phrase</p> <p>3 that I -- that I isolated, right --</p> <p>4 Q. Okay.</p> <p>5 A. I did not.</p> <p>6 Q. And, now, I'm asking you:</p> <p>7 A. Right.</p> <p>8 Q. And there is evidence for the rest</p> <p>9 of the phrase, right?</p> <p>10 A. I don't know about consistent --</p> <p>11 consistently, and I take up the circular</p> <p>12 reasoning on the "Where We Go One, We Go All"</p> <p>13 in a different section of my report. So I do</p> <p>14 disagree with that, but it's not here.</p> <p>15 Q. Right.</p> <p>16 There's no circular reasoning in</p> <p>17 this sentence.</p> <p>18 A. Yes, it is, if that sentence is --</p> <p>19 is used to form Mr. Rothschild's opinion on,</p> <p>20 you know, Jack's frequent uses of Q phrases</p> <p>21 could be -- could be more than enough</p> <p>22 evidence for CNN to claim that Jack and</p> <p>23 Leslie were Q followers.</p> <p>24 This is the paragraph above. So</p>	<p style="text-align: right;">Page 288</p> <p>1 that the phrase, "Where We Go One, We Go All"</p> <p>2 was there?</p> <p>3 MR. BISS: Object to the form.</p> <p>4 BY MS. BOLGER:</p> <p>5 Q. You have to at admit that "WWG1"</p> <p>6 was there. You have to admit he referenced</p> <p>7 Q-drops and used QAnon hashtags, like "The</p> <p>8 Great Awakening," like this picture of his</p> <p>9 brother with "The Great Awakening."</p> <p>10 You -- you have to admit that those</p> <p>11 are part of Jack Flynn's Twitter feed, right?</p> <p>12 MR. BISS: Object to the form.</p> <p>13 THE WITNESS: These are part</p> <p>14 of his Twitter feed?</p> <p>15 Can I just step back for a</p> <p>16 second?</p> <p>17 BY MS. BOLGER:</p> <p>18 Q. That -- that's my question, so...</p> <p>19 A. I -- I said, I -- they are part of</p> <p>20 his Twitter feed.</p> <p>21 Q. Okay.</p> <p>22 A. The question is: Well, what does</p> <p>23 that mean? That is the question.</p> <p>24 Q. No, no, that's not my question.</p>
<p style="text-align: right;">Page 287</p> <p>1 we're trying to understand in the context of</p> <p>2 Mr. Rothschild's report what he's using this</p> <p>3 sentence for that you just read to me.</p> <p>4 Q. What's -- what's confus- -- what</p> <p>5 I'm finding a hard time with in articulating</p> <p>6 why I think you're not -- well, you're wrong</p> <p>7 about this particular quibble.</p> <p>8 You think, based on your personal</p> <p>9 knowledge of the documents Jack Flynn has</p> <p>10 provided to you, that Jack Flynn had an</p> <p>11 intent in using these words that was not</p> <p>12 QAnon based?</p> <p>13 A. I do.</p> <p>14 MR. BISS: Object to the form.</p> <p>15 BY MS. BOLGER:</p> <p>16 Q. You have that basis based on all of</p> <p>17 the information you got from Jack Flynn</p> <p>18 personally in helping you come up with your</p> <p>19 theory, right?</p> <p>20 Even in that evidence --</p> <p>21 MR. BISS: Object to the form.</p> <p>22 BY MS. BOLGER:</p> <p>23 Q. Evidence in this evidence, which is</p> <p>24 handpicked by Mr. Flynn, you have to admit</p>	<p style="text-align: right;">Page 289</p> <p>1 My question is --</p> <p>2 A. Okay.</p> <p>3 Q. -- you have to admit that these</p> <p>4 things are public and exist in the world that</p> <p>5 Mr. Rothschild is listing --</p> <p>6 A. Okay. Back to Rothschild?</p> <p>7 Q. -- with the exception of the boost</p> <p>8 conspiracy clause, which I know you take</p> <p>9 issue with. The other things.</p> <p>10 A. Well, here's the thing: The videos</p> <p>11 of them saying these words, "Where We Go One,</p> <p>12 We Go All," Rothschild says that -- just</p> <p>13 above, that there's enough evidence for CNN</p> <p>14 to plausibly claim that Jack and Leslie were</p> <p>15 Q followers when they say those words.</p> <p>16 And one of the reasons he gives for</p> <p>17 this plausibility is that the phrase, "Where</p> <p>18 We Go One, We Go All," and the abbreviation</p> <p>19 associated with it, were frequently used on</p> <p>20 Jack's tweet. It's circular.</p> <p>21 If he didn't know what this stood</p> <p>22 for, it can't be evidence for them -- for --</p> <p>23 for him and Leslie being QAnon followers.</p> <p>24 Q. See, I really disagree with you on</p>

<p style="text-align: right;">Page 290</p> <p>1 that. First of all, I think that's not what 2 it says. And you and I can quibble about it 3 all day long. 4 Also, the fact that you won't just 5 agree with me that Jack Flynn used Twitter 6 hash- -- QAnon hashtags all of the time is 7 telling. 8 But third -- 9 MR. BISS: Telling to who, to 10 you? 11 BY MS. BOLGER: 12 Q. Third -- 13 MR. BISS: It's not telling to 14 me. 15 BY MS. BOLGER: 16 Q. -- the belief that someone can use 17 a random hashtag a couple times and 18 accidentally say something they don't mean is 19 something I'm with you on. 20 There is -- are hundreds of times 21 when Jack Flynn used hashtags or memes or 22 phrases or, I mean, in this literal picture, 23 which is in Exhibit -- no idea -- 38 -- I'll 24 will get the exhibit number -- there's</p>	<p style="text-align: right;">Page 292</p> <p>1 Q. Even after -- 2 A. -- than QAnon. 3 Q. -- the newspaper articles? 4 A. I think if somebody believes 5 something, even when they're wrong, they 6 stick to their guns, especially if they're 7 attacked. 8 And if you've ever tried to dispute 9 with QAnon followers, their -- their beliefs, 10 that's a great example, but in any kind of a 11 belief system if somebody believes something 12 and you try to attack them for it, if he 13 believed that "Where We Go One, We Go All" 14 was a family value thing, and he felt 15 persecuted and associated with somebody or 16 something he wasn't feeling was a fair 17 association, chances are good that people 18 double-down, triple-down on their beliefs. 19 Q. But you have no basis to conclude 20 that. 21 MR. BISS: Object to the form. 22 BY MS. BOLGER: 23 Q. That's just you guessing. Chances 24 are -- you said it. Chances are that's not</p>
<p style="text-align: right;">Page 291</p> <p>1 literally him putting a picture of his 2 brother with the matrix behind it that says, 3 "The Great Awakening," right? 4 You can make one or two comments 5 online that you don't intend, but I think -- 6 and I'm asking you your expert opinion of 7 this: Isn't it the case that experts like 8 you think about how often people do things 9 and reach conclusions based on it; in other 10 words, isn't it more plausible that someone 11 gets it accidentally the first time, but after 12 the 200th time, aren't you as a scientist 13 able to think, "Hey, there's something going 14 on here"? 15 MR. BISS: Object to the form. 16 THE WITNESS: I didn't say, 17 "accidentally." 18 I said he thought it meant 19 something other than what QAnon 20 meant. That's what he said. 21 BY MS. BOLGER: 22 Q. Even after -- 23 A. He thought it was something 24 different --</p>	<p style="text-align: right;">Page 293</p> <p>1 a -- that's not a factual basis for an 2 opinion, chances are, right? 3 A. You -- you asked how -- how I can 4 believe it, and I explained to you -- you 5 asked me repeatedly, how can you believe it? 6 What basis is there? 7 Q. Yeah -- 8 A. And I gave you how I can believe 9 it. And, now, you're not happy with that, so 10 let's try something else. 11 Q. No. 12 MR. BISS: That's exactly 13 right. 14 BY MS. BOLGER: 15 Q. If there's an imprecision in my 16 question, then I'll try again. 17 You can have an opinion that 18 Jack Flynn's a really great guy and you 19 believe every word he says and there's 20 nothing in the world that can ever change 21 that, right? That's fine, but that's -- and 22 I don't think that is your opinion. 23 My opinion -- my -- my point is 24 you're having -- your expert opinion --</p>

<p style="text-align: right;">Page 294</p> <p>1 A. Yes.</p> <p>2 Q. -- right, is that he never thought</p> <p>3 these words were affiliated with QAnon, and</p> <p>4 they were completely by himself.</p> <p>5 And I don't understand how you're</p> <p>6 in the face of the volume of information that</p> <p>7 Mr. Flynn put out into the world after he</p> <p>8 knew it was a QAnon slogan, after he was told</p> <p>9 it was a QAnon slogan, I would like to know</p> <p>10 what your methodology as an expert is that</p> <p>11 lets you discount all of it, and accept only</p> <p>12 his explanation?</p> <p>13 MR. BISS: Object to the form.</p> <p>14 THE WITNESS: I don't discount</p> <p>15 all of it, and I disagree with you</p> <p>16 that all of this volume of</p> <p>17 information speaks to the same</p> <p>18 thing as you think it does.</p> <p>19 For example, the picture of</p> <p>20 General Flynn speaks to his support</p> <p>21 of General Flynn, and it's</p> <p>22 completely unclear to me that any</p> <p>23 other interpretation is needed</p> <p>24 other than his support for his</p>	<p style="text-align: right;">Page 296</p> <p>1 the judgments they make.</p> <p>2 Q. All people who get paid, right?</p> <p>3 A. Well, some people put all of their</p> <p>4 eggs in one basket, and, then, you know,</p> <p>5 they're a little bit more invested in that</p> <p>6 basket than others, and that can sometimes</p> <p>7 create conflicts of interest when, you know,</p> <p>8 counting things out of that basket makes it</p> <p>9 less lucrative.</p> <p>10 Q. So this is all speculative.</p> <p>11 This is just what you think Mike --</p> <p>12 Mike -- Mike Rothschild does?</p> <p>13 A. I didn't say that's what he does.</p> <p>14 Q. It's definitely --</p> <p>15 A. I said that it's a serious</p> <p>16 consideration.</p> <p>17 I said, "Mike Rothschild might,</p> <p>18 therefore, be inclined to count false</p> <p>19 positives as QAnon followers, thus</p> <p>20 perpetuating the procedural elements of QAnon</p> <p>21 and boosting his sales and hers as a</p> <p>22 journalist relying on selling stories of</p> <p>23 QAnon."</p> <p>24 Q. That's speculative, right?</p>
<p style="text-align: right;">Page 295</p> <p>1 brother and his --</p> <p>2 BY MS. BOLGER:</p> <p>3 Q. It has a "Q" on it. It has a "Q."</p> <p>4 A. Okay. It also has General Flynn on</p> <p>5 it.</p> <p>6 Q. Okay. Okay.</p> <p>7 I -- I didn't quite understand your</p> <p>8 point about conflict of interest, but I'll</p> <p>9 just, I guess, ask you directly.</p> <p>10 Is it your belief that if someone</p> <p>11 is paid to do something, they have an</p> <p>12 incentive to lie?</p> <p>13 A. I didn't say, "lie." I never said,</p> <p>14 "lie." Conflict of interest.</p> <p>15 Q. Right.</p> <p>16 I'm actually -- as I told you, I</p> <p>17 don't actually understand your conflict of</p> <p>18 interest point.</p> <p>19 A. Okay.</p> <p>20 Q. So I'm asking you: Is your -- is</p> <p>21 your argument that someone's financial</p> <p>22 interest caused them to have false opinions?</p> <p>23 What is your -- what is your --</p> <p>24 A. To have biases in what they -- in</p>	<p style="text-align: right;">Page 297</p> <p>1 You have no evidence to support</p> <p>2 that claim, right?</p> <p>3 A. That's right.</p> <p>4 Q. Okay. Next para- -- next section</p> <p>5 is about bias.</p> <p>6 And you say kind of in the middle</p> <p>7 that paragraph, "However, Mr. Rothschild</p> <p>8 supplies no evidence that General Flynn or</p> <p>9 Sidney Powell ever spoke to or acted on</p> <p>10 behalf of Jack and/or Leslie Flynn or shared</p> <p>11 his opinions on QAnon or instructed Jack and</p> <p>12 Leslie Flynn of the meaning of the phrase,</p> <p>13 'Where We Go One, We Go All,' or what to</p> <p>14 believe."</p> <p>15 But that's incorrect. We've</p> <p>16 already shown that today. I showed you the</p> <p>17 tweet from Sidney Powell where she said she</p> <p>18 was authorized to speak on behalf of the</p> <p>19 Flynn family, right?</p> <p>20 MR. BISS: Objection to the</p> <p>21 form. That's not evidence of</p> <p>22 anything.</p> <p>23 THE WITNESS: She said that,</p> <p>24 but she was not speaking on behalf</p>

<p style="text-align: right;">Page 298</p> <p>1 of the family, and that's in the 2 deposition. 3 She was not their lawyer. She 4 was not tasked with speaking on 5 behalf of the family. I read that 6 as part of the materials. 7 I can say I speak on behalf of 8 the Flynn family, too, and it 9 doesn't mean anything. 10 BY MS. BOLGER: 11 Q. Too many -- too many documents. 12 Also, if someone reads a tweet from 13 Sidney Powell, who is General Flynn's lawyer 14 who said, "The Flynn family asked me to do 15 this," what do you think a reasonable reading 16 of that tweet is? 17 MR. BISS: Objection to the 18 form. Who -- who? Who? 19 THE WITNESS: You keep asking 20 me about perceptions of people who 21 read tweets, and I can't speak to 22 that. That's one. 23 Two, I don't know what the 24 Flynn family actually stands for.</p>	<p style="text-align: right;">Page 300</p> <p>1 - - - 2 (Whereupon, Exhibit=429, Email 3 Thread, Tab 59, was marked for 4 identification.) 5 - - - 6 MS. CHERNER: This is Tab 59? 7 MS. BOLGER: Tab 59, yes. 8 BY MS. BOLGER: 9 Q. Okay. For the record, this is an 10 email string. The first one at the back page 11 is -- obviously, the first one in 12 chronological order is from Matt Shuham from 13 Talking Points Memo to Ms. Powell, asking her 14 to provide a statement about the oath taken 15 by Michael Flynn. 16 And, then, Ms. Powell writes a 17 response, and she forwards it on to the 18 people you can't see from this version of the 19 email, because there's like eight versions of 20 this email. 21 And you'll see that the top email 22 in the response is from LFlynn62@aol.com. 23 That is Leslie Flynn, okay. 24 So this is Sidney Powell speaking</p>
<p style="text-align: right;">Page 299</p> <p>1 Is it General Flynn and his wife? 2 Is it General Flynn and Joe Flynn? 3 It is General Flynn and all of his 4 siblings and his spouses? 5 BY MS. BOLGER: 6 Q. I actually asked General Flynn 7 that. 8 A. Is it all the third cousins who 9 live somewhere around the world? What does 10 it mean -- 11 Q. I actually -- 12 A. -- when Sidney Powell 13 states --states that? 14 Q. I asked General Flynn what the 15 Flynn family is, and, I assure you, it's 16 everything else. 17 A. But that's not Sidney Powell, 18 right? General Flynn is not the one who is 19 tweeting the Flynn family. 20 Q. Let me show you an email, which was 21 produced in this litigation bearing the Bates 22 number PX602? 23 MS. BOLGER: Am I at 430? No. 24 429.</p>	<p style="text-align: right;">Page 301</p> <p>1 on behalf of the Flynn family, and 2 Leslie Flynn saying, "Go get them," right? 3 MR. BISS: Object to the form. 4 That's -- that's not what it is at 5 all. Come on. 6 THE WITNESS: Where does she 7 say she's speaking on behalf of 8 the -- it says, "I only know what 9 General Flynn and I mean by our 10 post." 11 It's the opposite of what 12 you're saying it states. 13 It doesn't state on behalf 14 of -- 15 MR. BISS: You can't lie, 16 Kate. 17 BY MS. BOLGER: 18 Q. What is she -- what -- what do you 19 think -- 20 A. It's -- 21 Q. -- "Go get them, Sidney" means? 22 Do you think -- do you think Leslie 23 Flynn is saying, "I don't want any connection 24 to Sidney Powell"?</p>

<p style="text-align: right;">Page 302</p> <p>1 A. I am sorry. Let's -- let's just 2 get first through the -- through the point 3 that she's not, in fact, speaking for the 4 Flynn family, so "Go get them" cannot 5 possibly refer to that. 6 She's not speaking on behalf of the 7 family, or making that clear to the person -- 8 Q. Okay. Did you see -- 9 A. -- she's emailing. 10 Q. Did you see what was Exhibit-423 11 where Gen- -- Sidney Powell says, "The Flynn 12 family and legal team appreciate the support 13 in all forms we have received," right? 14 She was speaking on behalf of the 15 Flynn family, or at least she was holding 16 herself out that way, right? 17 A. She was saying that, A -- and I 18 don't know what the Flynn family means -- 19 Q. Okay. Well, Mr. -- 20 A. -- B. 21 Q. -- well, General Flynn means it 22 means his siblings. 23 MR. BISS: Object to the form. 24 Mischaracterizes testimony.</p>	<p style="text-align: right;">Page 304</p> <p>1 said, "You often use the phrase 2 'Inspired by' -- 'inspired by 3 family. When you say 'family,' 4 what do you mean? 5 "Answer: My family, my 6 brothers and sisters, my nieces and 7 nephews, my aunts and uncles. 8 "Question. Okay. The whole 9 Flynn clan, rather than just your 10 nuclear family? 11 "Answer. Right." 12 BY MS. BOLGER: 13 Q. So -- 14 A. Can -- can we -- 15 Q. -- that's how General Flynn defers 16 to his family. 17 A. Well, can we link it back to the 18 point that you were making, which is 19 Sidney Powell's tweet. However, 20 General Flynn considers his family is not 21 clear to me that Sidney Powell represents all 22 of them; and, in fact, I don't believe she 23 does. I believe she only represents 24 General Flynn.</p>
<p style="text-align: right;">Page 303</p> <p>1 You can't believe anything she 2 says. 3 MS. BOLGER: If you call me a 4 liar or question my integrity one 5 more time, we're going to have to 6 have a conversation with the judge. 7 MR. BISS: I do, Kate. 8 BY MS. BOLGER: 9 Q. What he said was -- 10 MR. BISS: And -- and we just 11 saw you do it -- try to do it again 12 with Exhibit-429. 13 MS. BOLGER: I'm sorry. I'm 14 trying to find General Flynn's 15 definition of family. 16 Lindsey, do you know where 17 that is? 18 MS. CHERNER: Yeah, it's 19 Page 23, but it's Deposition Cite 20 Page 112, Lines 18 through 25. 21 MS. BOLGER: And what does he 22 say? 23 MS. CHERNER: He says, "You 24 often use the phrase" -- or you</p>	<p style="text-align: right;">Page 305</p> <p>1 So his construction of family is 2 independent to her ability to speak on the 3 entire family's behalf, unless I am missing 4 information that she was, in fact, 5 representing all of them. 6 Q. And yet, even though you may be 7 missing information, you feel comfortable 8 saying that Mike Rothschild was wrong? 9 MR. BISS: Object to the form. 10 BY MS. BOLGER: 11 Q. Even though you know of the 12 existence of a tweet where she says, "I'm 13 speaking on behalf of the Flynn family," 14 you're comfortable saying, "The only reason 15 Mike Rothschild said it was because he was 16 biased"? 17 A. She represents General Flynn. And, 18 so, when she says, "the Flynn family," if we 19 want to think about who she's speaking on 20 behalf of, that's the only possible 21 interpretation because she does not represent 22 as a lawyer other members -- members of the 23 Flynn family. 24 So what General Flynn considers his</p>

<p style="text-align: right;">Page 306</p> <p>1 family is unrelated to what we can take from 2 Sidney Powell's words, "the Flynn family" as 3 her speaking on their behalf. That's one 4 thing. 5 Another thing -- 6 Q. But you disagree with Mike 7 Rothschild -- 8 MR. BISS: You interrupted 9 her, Kate. You said you would 10 never do that. 11 BY MS. BOLGER: 12 Q. You disagree with Mike Rothschild 13 on that, right? 14 A. On -- on what? 15 Q. You say you disagree that he has 16 any evidence that General Flynn or 17 Sidney Powell ever spoke of acted on behalf 18 of Jack or Leslie Flynn, right, you disagree 19 with him on that? 20 A. I disagree with him on that. 21 Q. All right. 22 A. And -- and can I answer your 23 question that we got interrupted with by 24 going to General Flynn's deposition?</p>	<p style="text-align: right;">Page 308</p> <p>1 It wasn't QAnon at all. And, so, Leslie is 2 agreeing with that. 3 I'm asking you: Do you really 4 think that that's what Sidney Powell meant? 5 A. I -- 6 Q. Are you accepting whatever 7 Sidney Powell says as true for the purposes 8 of this question? 9 A. I have -- 10 MR. BISS: Which question 11 would you like her to answer? 12 BY MS. BOLGER: 13 Q. You can answer. 14 A. I have no opinion on Sidney 15 Powell's truthfulness. I'm not familiar 16 enough with her character. 17 I do, however, have some opinion on 18 Leslie Flynn, and I believe what she says, 19 "Go get them, Sidney," she's genuine in her 20 excitement about Sidney Powell's words, 21 whatever those words are. 22 And those words happen to be 23 drawing a clear line between QAnon, 24 conspiracy theories and herself and General</p>
<p style="text-align: right;">Page 307</p> <p>1 In this email that you gave me 2 as -- as evidence, Sidney Powell who got "Go 3 get them, Sidney," from Leslie Flynn states 4 unequivocally that, "Neither of us knows Q or 5 QAnon or follows anyone because of that," 6 blah, blah, blah. Something about conspiracy 7 theories. Hold on. 8 "Scrap your own conspiracy theory. 9 It's log wash. So, "Go get 'em, Sidney" 10 supports disavowing a connection between 11 General Flynn, herself, and QAnon. 12 So it does not at all speak against 13 my opinion that Leslie Flynn was not a 14 supporter of QAnon, and Sidney Powell did not 15 speak on her behalf. 16 Q. Do you take Sidney Powell at face 17 value, absolutely, at what she says in this 18 email? 19 A. I do not. I'm responding to you -- 20 Q. You just said -- 21 A. -- showing me evidence from Leslie 22 Flynn. 23 Q. You just told me that Sidney Powell 24 says they weren't involved in QAnon at all.</p>	<p style="text-align: right;">Page 309</p> <p>1 Flynn, and my role here is to speak to Leslie 2 Flynn's beliefs and statements. 3 Q. Have you met Leslie Flynn? 4 A. No. 5 Q. You take some time in your -- in 6 your report to talk about Terry Giddens. 7 Are you here to rebut Terry 8 Giddens' report -- report? 9 A. No. 10 Q. Okay. And you know Mike Rothschild 11 did not rely on Giddens' report, right? 12 A. Right. 13 Q. Okay. Do you disagree with the 14 sentence that the "Where We Go One, We Go 15 All" is a key catch phrase in the QAnon 16 movement? 17 A. I do not. 18 Q. You have this long discussion of -- 19 I keep hearing the Latin in my head. 20 Is it Jedem das Seine? How do you 21 say it? 22 A. Jedem das Seine. 23 Q. Okay. But it's the same as suum 24 cuique?</p>

<p style="text-align: right;">Page 310</p> <p>1 A. Yes.</p> <p>2 Q. And it's the same as Plato, right?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. So those words existed in</p> <p>5 the universe before the horrific gates and</p> <p>6 book involved, right?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. So, now, when someone uses</p> <p>9 the phrase, "To each his own," it could be --</p> <p>10 a lot of people think it's from Shakespeare,</p> <p>11 which it wasn't.</p> <p>12 They think it's from Polonius. A</p> <p>13 lot of people think it -- it could be from</p> <p>14 Plato. It could be from suum cuique. It</p> <p>15 could be from the -- it could be the book</p> <p>16 involved. There's a number of things that</p> <p>17 that could be referencing, or, by the way,</p> <p>18 they could know none of them, right? Right?</p> <p>19 A. But John Dawn even, they might</p> <p>20 think.</p> <p>21 Q. He doesn't have a "Where We Go One,</p> <p>22 We Go All." No Flynn had read the poem.</p> <p>23 THE COURT REPORTER: I'm</p> <p>24 sorry, you are going entirely too</p>	<p style="text-align: right;">Page 312</p> <p>1 don't know.</p> <p>2 Anyway, it's Swedish, I guess.</p> <p>3 Anyway, a smorgas- -- a buffet.</p> <p>4 We'll do it this way.</p> <p>5 A. Okay.</p> <p>6 Q. There's a -- we can say there's a</p> <p>7 buffet --</p> <p>8 A. Okay.</p> <p>9 Q. -- of things that "To each his own"</p> <p>10 can mean --</p> <p>11 A. Yeah.</p> <p>12 Q. -- and I just talked about some of</p> <p>13 them.</p> <p>14 A. Yeah.</p> <p>15 Q. What are the dishes at the buffet</p> <p>16 of meaning --</p> <p>17 A. Yeah.</p> <p>18 Q. -- for "Where We Go One, We Go</p> <p>19 All"?</p> <p>20 A. Yeah. So one dish, as I already</p> <p>21 mentioned, that I found is empirically out</p> <p>22 there is Scottish independence.</p> <p>23 Q. But that's now.</p> <p>24 A. I don't know when.</p>
<p style="text-align: right;">Page 311</p> <p>1 fast.</p> <p>2 BY MS. BOLGER:</p> <p>3 Q. He doesn't say, "Where We Go One,</p> <p>4 We Go All," and no Flynn has read --</p> <p>5 THE COURT REPORTER: You're</p> <p>6 going too fast. You're really</p> <p>7 going too fast.</p> <p>8 BY MS. BOLGER:</p> <p>9 Q. So we talked about the smorgasbord</p> <p>10 of possible things that "To each its own" can</p> <p>11 mean, including, by the way, not knowing</p> <p>12 anything about it.</p> <p>13 What the smorgasbord of things that</p> <p>14 you think "Where We Go One, We Go All" could</p> <p>15 possibly mean?</p> <p>16 A. I'm sorry, what is a smorgasbord?</p> <p>17 I'm very sorry. I have no idea what you</p> <p>18 mean.</p> <p>19 Q. Okay. A smorgasbord is, like, a</p> <p>20 big buffet where they serve lots of different</p> <p>21 dishes and herring.</p> <p>22 A. I see.</p> <p>23 Q. And herring.</p> <p>24 It's a -- maybe, is it Yiddish? I</p>	<p style="text-align: right;">Page 313</p> <p>1 MR. BISS: Kate, do you want</p> <p>2 her to answer the question?</p> <p>3 BY MS. BOLGER:</p> <p>4 Q. You found that now.</p> <p>5 A. No -- I found it now, but it exists</p> <p>6 out there.</p> <p>7 Q. Right.</p> <p>8 A. You're asking me a general question</p> <p>9 about --</p> <p>10 Q. Okay.</p> <p>11 A. -- other meanings --</p> <p>12 Q. Okay. Can I --</p> <p>13 A. -- like the smorgasbord.</p> <p>14 THE COURT REPORTER: Okay.</p> <p>15 This is impossible.</p> <p>16 MS. BOLGER: Sorry.</p> <p>17 THE COURT REPORTER: I can't</p> <p>18 do this.</p> <p>19 MS. BOLGER: I'm getting</p> <p>20 tired. I apologize.</p> <p>21 THE COURT REPORTER: I can't</p> <p>22 do this with you people --</p> <p>23 everybody yelling over each other.</p> <p>24 It's impossible.</p>

<p style="text-align: right;">Page 314</p> <p>1 MS. BOLGER: My apologies.</p> <p>2 BY MS. BOLGER:</p> <p>3 Q. In July -- on July 4th in 2020,</p> <p>4 when the Flynns said the words, what were the</p> <p>5 possible dishes at the buffet?</p> <p>6 A. They are the same as they ever</p> <p>7 were, same as they ever were, which include</p> <p>8 any kind of unity, apparently Scottish unity,</p> <p>9 or family unity, as the Serbian poster</p> <p>10 thinks, or there is a basketball coach in PA</p> <p>11 who keeps posting, "Where We Go One, We Go</p> <p>12 All" to celebrate her team's victories or</p> <p>13 anniversaries or whatever.</p> <p>14 So unity of a team, a nation, a</p> <p>15 family, that's what that phrase -- that</p> <p>16 phrase has as its internal meaning. And, so,</p> <p>17 the possibilities are the ones that contain</p> <p>18 that meaning.</p> <p>19 Q. You have a -- a section in your</p> <p>20 rebuttal report saying that,</p> <p>21 "Mr. Rothschild's inference at accepting</p> <p>22 money associated with QAnon symbology means</p> <p>23 Jack Flynn supports QAnon."</p> <p>24 I think -- and, then, you make a</p>	<p style="text-align: right;">Page 316</p> <p>1 hundreds of dollars to General Flynn," and</p> <p>2 there is a symbol and Jack Flynn re-tweeted</p> <p>3 it, and that's your evidence.</p> <p>4 Q. Well, that's one evidence, but</p> <p>5 there's testimony in which the Flynns say</p> <p>6 repeatedly they didn't care where the money</p> <p>7 came from. They took the money from</p> <p>8 everywhere -- anywhere.</p> <p>9 That's not the same as saying, "We</p> <p>10 only take people from money" -- "We only take</p> <p>11 money from people with the Free Mason on it,"</p> <p>12 right? It's not the same as saying, "We'll</p> <p>13 only take QAnon money."</p> <p>14 It's the opposite. It's saying,</p> <p>15 "We don't care, just give us money," right?</p> <p>16 A. And it's exactly like that with the</p> <p>17 one dollar bill, in that people will take it</p> <p>18 if you print Free Mason signs on them, or any</p> <p>19 other signs. Most people don't even know</p> <p>20 what those signs are, and don't need to find</p> <p>21 and don't try to.</p> <p>22 They will take the money no matter</p> <p>23 what symbol it comes from it -- with it, just</p> <p>24 Leslie and Jack Flynn testified, they would</p>
<p style="text-align: right;">Page 315</p> <p>1 reference to taking a dollar bill.</p> <p>2 A. Yes.</p> <p>3 Q. I think maybe you misunderstand</p> <p>4 what Mr. Rothschild is saying.</p> <p>5 He's not saying that the money or</p> <p>6 the -- that it necessarily is linked to</p> <p>7 QAnon. What Mr. Flynn testified and what</p> <p>8 Lori Flynn testified and what General Flynn</p> <p>9 testified was that they didn't care if the</p> <p>10 money was connected to QAnon, right, didn't</p> <p>11 care --</p> <p>12 A. Yeah.</p> <p>13 Q. -- took it anyway?</p> <p>14 A. Yeah.</p> <p>15 Q. So it has nothing to do with the</p> <p>16 dollar bill example, right, they're not</p> <p>17 getting money with a symbol. They're not</p> <p>18 getting donations with a symbol.</p> <p>19 They'll just take any money they</p> <p>20 can get, right?</p> <p>21 A. They are getting donations with a</p> <p>22 symbol, and re-tweeting it. That's in your</p> <p>23 evidence.</p> <p>24 Somebody says, "I just donated some</p>	<p style="text-align: right;">Page 317</p> <p>1 take the money for the defense found.</p> <p>2 Q. But when they asked for money for</p> <p>3 the defense fund, or when they sell their</p> <p>4 T-shirts, it says, "WWG1WGA."</p> <p>5 To use your hypothetical, that</p> <p>6 means that they're putting out a tweet that</p> <p>7 has a Freemason eye on it, right?</p> <p>8 MR. BISS: You did it again,</p> <p>9 Kate. They didn't sell any</p> <p>10 T-shirts. Jack and Leslie Flynn</p> <p>11 didn't sell any T-shirts.</p> <p>12 BY MS. BOLGER:</p> <p>13 Q. That you would get a Free Mason --</p> <p>14 they're -- they're -- your -- your</p> <p>15 hypothetical would mean that in this re-tweet</p> <p>16 from Jack Flynn where he talks about selling</p> <p>17 T-shirts to make money for the shirt show for</p> <p>18 General Flynn, he says, "WWG1WGA," but he --</p> <p>19 he's saying I'll take your money.</p> <p>20 He's saying, to use your</p> <p>21 hypothetical, "Give me" -- "give me money,</p> <p>22 Free Masons," by putting the triangle on,</p> <p>23 isn't he?</p> <p>24 I mean, isn't this the equivalent</p>

<p style="text-align: right;">Page 318</p> <p>1 of the Free Mason triangle?</p> <p>2 A. Well, that's the parallel.</p> <p>3 Q. Yeah, that's what I meant.</p> <p>4 A. That's the parallel, yeah.</p> <p>5 Q. Right.</p> <p>6 A. This is the sign on -- on --</p> <p>7 printed on the T-shirt. This is --</p> <p>8 Q. Yeah.</p> <p>9 A. -- part of the T-shirt.</p> <p>10 Q. Yes.</p> <p>11 A. So, yeah, anybody can buy the</p> <p>12 T-shirt, and give them money, right, so</p> <p>13 they're...</p> <p>14 Q. But they're -- they're putting out</p> <p>15 the sign that they're available to people who</p> <p>16 are interested in WWG1WGA, right?</p> <p>17 A. Yes.</p> <p>18 Q. Right.</p> <p>19 A. Yes.</p> <p>20 Q. So they're saying, "Hey, people</p> <p>21 with Free Mason symbols on your dollar,</p> <p>22 here's our Free Mason symbol."</p> <p>23 That's the parallel, right?</p> <p>24 A. Well, Jack is not saying that.</p>	<p style="text-align: right;">Page 320</p> <p>1 different or in contradiction to what I said.</p> <p>2 Q. You say in your -- in your</p> <p>3 report -- and this is a minor point, so we</p> <p>4 won't spend too much time on it.</p> <p>5 You say that they are receiving</p> <p>6 moneys with symbols on them, so you can't</p> <p>7 take anything away from it.</p> <p>8 And I'm telling you, I don't think</p> <p>9 you're right because I think what they're</p> <p>10 doing is sending a symbol out, and</p> <p>11 encouraging people to give money to the</p> <p>12 symbol rather than passively sitting there</p> <p>13 receiving it.</p> <p>14 So my -- my analogy -- and I think</p> <p>15 you're right, it's parallel to my analogy --</p> <p>16 is that there's -- this is a Free Mason</p> <p>17 triangle calling on people to give money,</p> <p>18 Free Mason, and I that's different. And I'm</p> <p>19 asking you if you disagree.</p> <p>20 MR. BISS: Object to the form.</p> <p>21 THE WITNESS: I'm still not</p> <p>22 sure I understand. I'm so sorry.</p> <p>23 BY MS. BOLGER:</p> <p>24 Q. That's okay.</p>
<p style="text-align: right;">Page 319</p> <p>1 He's re-tweeting somebody who is saying that.</p> <p>2 Q. Fine. It's saying, "Hey, Free</p> <p>3 Masons, here's your triangle. Come by our</p> <p>4 stuff," right?</p> <p>5 A. Well, yeah, Jack is just interested</p> <p>6 in -- in the money that comes from buying</p> <p>7 that, right?</p> <p>8 Q. Yes, but he's using symbology to</p> <p>9 get --</p> <p>10 A. He's not. Somebody else is.</p> <p>11 Q. He's re-tweeting --</p> <p>12 A. Yes.</p> <p>13 Q. -- that this is -- he's -- he</p> <p>14 himself re-tweeted --</p> <p>15 A. Yes.</p> <p>16 Q. -- this symbol in an effort to get</p> <p>17 money, right?</p> <p>18 MR. BISS: Object to the form.</p> <p>19 THE WITNESS: In an effort to</p> <p>20 get money to General Flynn?</p> <p>21 BY MS. BOLGER:</p> <p>22 Q. Yes.</p> <p>23 A. Right. He is re-tweeting that</p> <p>24 symbol. I don't understand how is it</p>	<p style="text-align: right;">Page 321</p> <p>1 A. I just don't understand this.</p> <p>2 Yeah, sorry.</p> <p>3 Q. So you're not a journalistic</p> <p>4 expert, right?</p> <p>5 A. Correct.</p> <p>6 Q. You have never been trained in</p> <p>7 journalism?</p> <p>8 A. Correct.</p> <p>9 Q. You have no idea what the law is</p> <p>10 affiliated with reporting?</p> <p>11 A. Other than the research that I did</p> <p>12 and summarized for this report on the ethics</p> <p>13 of journalism as they are listed on the</p> <p>14 website of Society of Professional</p> <p>15 Journalism.</p> <p>16 Q. Okay. Well, I didn't ask about</p> <p>17 ethics. I asked about law.</p> <p>18 You have no idea what the law of</p> <p>19 journalism is, right?</p> <p>20 MR. BISS: Object to the form.</p> <p>21 THE WITNESS: That's right,</p> <p>22 yes.</p> <p>23 BY MS. BOLGER:</p> <p>24 Q. Okay. And the only thing you know</p>

<p style="text-align: right;">Page 322</p> <p>1 about the Code of Ethics is having read the 2 SPJ Code of Ethics, right? 3 A. Correct. 4 Q. And did you notice on the bottom of 5 the SPJ Code of Ethics where it says that 6 "This isn't universal and it isn't standard 7 and it isn't meant to be enforceable 8 legally"? 9 A. I did not. 10 Q. Okay. Other than the SPJ, you have 11 absolutely no understanding about what 12 reasonable journalistic practices are 13 correct? 14 A. Correct. 15 Q. You have a long discussion in 16 your -- in the rebuttal report about how 17 beliefs can be measured based on what you 18 characterize as Mr. Rothschild saying, 19 "Belief cannot be measured." 20 And that's in that final paragraph 21 of his report where he says, "because belief 22 cannot be measured," right? 23 A. I think it's in the beginning of 24 his report. Where is his report? This is</p>	<p style="text-align: right;">Page 324</p> <p>1 describing anyone who shares QAnon material 2 or catch phrases as a follower or believer in 3 the conspiracy movement, even if quote, 4 'belief is a concept that cannot be 5 quantitatively measured.'" 6 A. That's it. Thank you. 7 Q. So you then have a -- a very 8 interesting discussion of how to measure 9 belief among a group of people by conducting 10 surveys and inquiries and sending questions. 11 It's pretty clear from context, but 12 we don't have to fight about it, that 13 Mr. Rothschild is talking about knowing what 14 Jack and Leslie Flynn believe. 15 In your "Measuring Beliefs" 16 section, am I correct that you did not apply 17 any of these methods in the "Measuring 18 Beliefs" section to Jack and Leslie Flynn? 19 A. That is incorrect. 20 Q. Okay. Which did you use? 21 A. Specifically, it says, "In addition 22 to survey measurements, there are other ways 23 of quantitatively assessing beliefs in QAnon" 24 -- sorry -- "in addition to survey</p>
<p style="text-align: right;">Page 323</p> <p>1 his report. The... 2 Q. Dr. -- Dr. Moskalenko, I really am 3 trying to help you. I think it might be that 4 last paragraph where it says, "It's important 5 to know with certainty" -- "It's impossible 6 to know with certainty whether Jack and 7 Leslie believed that QAnon is real," is that 8 correct? 9 A. No, He used the phrase -- 10 Q. Okay. Sorry. 11 A. No, no, no, I'm not -- I'm sorry, I 12 don't mean to -- 13 Q. No. I just want to know what 14 you're talking about. I was just trying to 15 help you. 16 A. Yeah, yeah. He used a phrase, 17 like, "The beliefs cannot be quantitatively 18 measured." 19 If only I could use a search 20 function. QAnon. 21 Q. I think I found it. It's on the 22 third page. 23 A. Thank you so much. 24 Q. "Standard Journalistic Practice of</p>	<p style="text-align: right;">Page 325</p> <p>1 measurements" -- 2 Q. I'm sorry, where are you? 3 A. Page 11 -- "there are other ways of 4 quantitatively assessing beliefs in QAnon." 5 Q. Okay. 6 A. "This can be done through different 7 interviews." 8 And, then, it says, "In a way, 9 depositions are like semi-structured 10 interviews, in that individuals can be asked 11 about their beliefs, and these answers are 12 then quantifiable." 13 And I give examples for how some 14 answers can be scored if one were inclined to 15 quantify these answers. 16 "Additionally, individuals may 17 spontaneously utter statements that indicate 18 their beliefs. This is something that is 19 used in case study analyses, like watching 20 somebody talk on their blog, or being 21 recorded during their arrest. Those 22 statements continuously uttered can also be 23 used to measure beliefs." 24 Q. But you said that you didn't look</p>

<p style="text-align: right;">Page 326</p> <p>1 at their social media in -- in doing these 2 reports? 3 A. I -- I did look at all the social 4 media exhibits that were provided to me. 5 Q. In your very first -- in your 6 report, in your opening report, you say you 7 did not look at their -- their full social 8 media. 9 A. Not at their full -- 10 Q. You're making a distinction. 11 A. Not at their full -- of course. 12 Q. But wouldn't that be imprecise, 13 then to say that I -- you can't say that 14 you've accurately assessed someone's social 15 media presence if you've only done the 16 self-selected -- looked at their social -- 17 self-selected tweets, right? 18 A. I've looked at their tweets that 19 were deemed to be most relevant to the case 20 by both you -- because you raised -- 21 Q. Why -- 22 A. -- those issues in -- 23 Q. I didn't do it. 24 A. -- in deposition.</p>	<p style="text-align: right;">Page 328</p> <p>1 to have them say something, and, then, 2 contradict it later. 3 You ask all kinds of questions in a 4 deposition that don't necessarily have to be 5 truth seeking. 6 In your investigations, you're 7 seeking to find the truth, right? 8 A. Right. 9 Q. That -- they're different. 10 A. Right. 11 Q. So I -- I -- I reject the idea that 12 a deposition is the same as the incredibly 13 sophisticated type of analysis that you are 14 specifically doing. They're not the same 15 things. I'm not interested in the same 16 things you're interested in, so I reject 17 that. 18 MR. BISS: Well -- 19 BY MS. BOLGER: 20 Q. But I also -- am also telling you 21 is -- so that's one. 22 And two is social media-wise, 23 you -- if you wanted to assess how someone 24 was spontaneously reacting on social media,</p>
<p style="text-align: right;">Page 327</p> <p>1 MR. BISS: You did. 2 THE WITNESS: You brought them 3 up in deposition. 4 BY MS. BOLGER: 5 Q. There's no reason to believe that I 6 think that's the most relevant. I didn't -- 7 I wasn't involved in this process at all. 8 You got a selected group of tweets, 9 but you never got the whole panoply of 10 their -- 11 A. No, no. Let me just back up a 12 second. 13 When you were asking Jack Flynn 14 about his certain use of certain hashtags or 15 of certain memes that he liked or re-tweeted, 16 were you not, in fact, asking him about 17 things that are relevant to this case in his 18 social media footprint? 19 Q. So that's a thing I think that I'm 20 telling you I disagree with you about 21 depositions and social media. 22 The way lawyers ask questions in a 23 deposition can be for all kinds of reasons. 24 You're aiming at a defense. You want to try</p>	<p style="text-align: right;">Page 329</p> <p>1 wouldn't you want to see everything they did, 2 rather than just the things they picked for 3 you? 4 MR. BISS: So -- hold on. 5 So this is your opportunity. 6 You've got seven hours to -- to 7 show her whatever documents you 8 have failed to show all the other 9 witnesses. 10 Whatever you have you want to 11 show her so she can -- she can 12 opine on it, show her. Show her 13 all these social media things 14 that -- that were never shown to 15 another witness in the case. 16 MS. BOLGER: So there's no 17 requirement that I do that. 18 THE WITNESS: Can I answer 19 your -- can I answer your question? 20 BY MS. BOLGER: 21 Q. Yes, please. 22 A. There is never a complete set of 23 data on any judgment, and, certainly, not on, 24 you know, journalistic judgments, and not on</p>

<p style="text-align: right;">Page 330</p> <p>1 social psychology or sociology judgments. 2 We are always limited in the data 3 we have access to, and we are then making 4 analyses and derived conclusions based on the 5 data we have, not on all the data out there. 6 Some- -- someone can be -- you 7 know, Ted Bundy was a very lovely person that 8 data people had -- who interacted with him 9 day to day, you know, led them to believe 10 that he was a very nice person. They did not 11 have access to other data, which, as we know, 12 painted him as a completely different person. 13 Sometimes the difference between 14 available and unavailable data are drastic 15 like that. Most of the time, they are not. 16 And in every single case, unless you are God. 17 There is data that you will not have, and you 18 will still be able to make an analysis of the 19 data you have and derive a conclusion from 20 that analysis. 21 Q. In this case -- 22 A. Yeah. 23 Q. -- what are the things you describe 24 for assessing belief --</p>	<p style="text-align: right;">Page 332</p> <p>1 here, right? 2 A. I did analyze the data available to 3 me. Yes, they were selected and provided to 4 me by Mr. Biss. 5 And using the same skills I use in 6 case studies and in analyzing interviews were 7 people utter things spontaneously, or when 8 prompted, I am able to analyze and derive an 9 opinion based on that analysis about their 10 beliefs. 11 Q. In the first paragraph on Page 11, 12 you have a discussion of a PRRI poll, and, 13 then, you talk about this -- the different 14 types of conspiracies, like flat earth, space 15 lasers -- 16 A. Mm-humm. 17 Q. -- lizards, and you say that they 18 were measured on a 5-point Likert Scale, 19 ranging from not at all to not very much. 20 You didn't do that in this case, 21 did you? 22 A. I did not. 23 Q. On Page 12, you say, "I don't know 24 who" -- you say -- in this report, you say</p>
<p style="text-align: right;">Page 331</p> <p>1 A. Yeah. 2 Q. -- that you used to assess the 3 personal beliefs of Jack and Leslie Flynn, 4 other than the documents that they selected 5 to give to you? 6 Reading them. That's all you -- 7 you read their stuff, right? You didn't 8 design a survey. 9 A. Right. 10 Q. You didn't develop questions. You 11 didn't do a semi-structured interview. 12 You couldn't have done those 13 things, because you can't have a survey of 14 one person, right? You didn't do any of 15 those things. So this discussion of -- 16 A. I can do a survey of one person. 17 Why not. 18 Q. It wouldn't be very interesting. 19 A. It depends on what you're into. 20 Q. You're -- but you're -- but you're 21 none of these things -- 22 A. I -- 23 Q. -- and this discussion of 24 qualitative belief are things that you did</p>	<p style="text-align: right;">Page 333</p> <p>1 that the first tweet, "I don't know who or 2 what Q is, so there's that, but no one's 3 hurting each other. It's civilized, 4 encouraging people to learn independently, 5 supports Trump, and the Constitution, so 6 "What The Fuck #WWG1." 7 And you say in the sentence, you 8 say, "The first tweet above begins by clearly 9 stating Jack Flynn had no knowledge of QAnon 10 in contradiction to Mr. Rothschild's 11 conclusions on Page 32, that Jack and Leslie 12 Flynn knew what the QAnon movement was." 13 Do you see that? 14 A. Yes. 15 Q. That's not what the tweet says, 16 though. It says, "I don't know who or what Q 17 is," right it doesn't say "QAnon." 18 A. Knowledge of QAnon. 19 Q. It doesn't say "QAnon." 20 It says "Q," right? 21 A. QAnon presumes some knowledge of Q. 22 Right, QAnon is a lot of things. 23 Q. We don't know who Q -- but nobody 24 knows who Q is. That's not -- no, it doesn't</p>

<p style="text-align: right;">Page 334</p> <p>1 presume knowledge about Q, right?</p> <p>2 Will you agree with me that that</p> <p>3 sentence, "I don't know who or what Q is, so</p> <p>4 there's that," does not say, "I do not know</p> <p>5 who or what QAnon is, so there's that"?</p> <p>6 A. I think he uses Q to stand in for</p> <p>7 QAnon as a second tweet suggests. I think</p> <p>8 "Q-sters" is not a term that people use, and</p> <p>9 "Q" is not a term that people use, which,</p> <p>10 again, speaks to lack of familiarity with</p> <p>11 the, you know, jargon.</p> <p>12 So he uses -- here he says,</p> <p>13 "Honestly, I ask myself about this Q thing.</p> <p>14 The Q thing is probably not the poster."</p> <p>15 Q. I'm not talking about that.</p> <p>16 A. I'm -- I'm interpreting the first</p> <p>17 in the -- in light of the second.</p> <p>18 Q. But that's not what your sentence</p> <p>19 says. The first tweet above begins by</p> <p>20 clearly stating that Jack Flynn has no</p> <p>21 knowledge of QAnon. Those are your words.</p> <p>22 A. Yes, to my --</p> <p>23 Q. That's incorrect.</p> <p>24 A. I -- I don't think that it is</p>	<p style="text-align: right;">Page 336</p> <p>1 But you're here to give an expert</p> <p>2 opinion not just your opinion.</p> <p>3 Is it your testimony, as you sit</p> <p>4 there, that every single person who reads</p> <p>5 that tweet would come up with exactly the</p> <p>6 same answer as you?</p> <p>7 MR. BISS: Object to the form.</p> <p>8 THE WITNESS: Ma'am, with all</p> <p>9 due respect, I cannot possibly,</p> <p>10 possibly presume to know what every</p> <p>11 single person who reads this might</p> <p>12 think. You keep asking me that,</p> <p>13 and I cannot ever answer that.</p> <p>14 BY MS. BOLGER:</p> <p>15 Q. Right.</p> <p>16 You can't guarantee that this</p> <p>17 analysis is repeatable by anybody else,</p> <p>18 right?</p> <p>19 MR. BISS: Object to the form.</p> <p>20 THE WITNESS: I cannot</p> <p>21 guarantee anything.</p> <p>22 THE VIDEOGRAPHER: Counsel,</p> <p>23 may have a break to change the</p> <p>24 cartridge?</p>
<p style="text-align: right;">Page 335</p> <p>1 incorrect.</p> <p>2 Q. You think having no knowledge of Q</p> <p>3 and having no knowledge of QAnon are the same</p> <p>4 thing?</p> <p>5 A. I think he's using Q to denote</p> <p>6 QAnon --</p> <p>7 Q. And --</p> <p>8 A. -- as he clearly does in the second</p> <p>9 tweet.</p> <p>10 Q. And that's -- your basis for that</p> <p>11 is that you got these from Mr. Flynn and you</p> <p>12 read them and you looked at them, and that's</p> <p>13 your conclusion, right?</p> <p>14 A. My basis for that is -- is</p> <p>15 reasonable interpretation the second tweet.</p> <p>16 I don't -- I don't need any more than that</p> <p>17 to -- you know, when I'm reading, honestly.</p> <p>18 I ask myself about this Q thing</p> <p>19 and, look for a reason not to trust anything</p> <p>20 about it. And, to me, this cannot possibly</p> <p>21 denote the poster. To me, it can only denote</p> <p>22 the entirety of QAnon. And, so, then, Q,</p> <p>23 to -- to him stands for QAnon.</p> <p>24 Q. Right.</p>	<p style="text-align: right;">Page 337</p> <p>1 MS. BOLGER: Yes, sure. I'm</p> <p>2 going to finish up pretty quickly.</p> <p>3 THE VIDEOGRAPHER: Are you</p> <p>4 okay with going off?</p> <p>5 MS. BOLGER: Yeah, we're going</p> <p>6 off.</p> <p>7 MR. BISS: Let's take a</p> <p>8 five-minute break.</p> <p>9 THE VIDEOGRAPHER: The time is</p> <p>10 4:01. We're going off the video</p> <p>11 record. This ends Media Unit</p> <p>12 Number 4.</p> <p>13 - - -</p> <p>14 (Whereupon, there was a brief</p> <p>15 recess held off the video record.)</p> <p>16 - - -</p> <p>17 THE VIDEOGRAPHER: The time is</p> <p>18 4:18. We are going back on the</p> <p>19 video record. This begins Media</p> <p>20 Unit Number 5.</p> <p>21 - - -</p> <p>22 (Back on the video record.)</p> <p>23 - - -</p> <p>24</p>

<p style="text-align: right;">Page 338</p> <p>1 BY MS. BOLGER:</p> <p>2 Q. When did you publish "Pastels and</p> <p>3 Pedophiles," or when was it published?</p> <p>4 A. I believe it was 2020.</p> <p>5 Q. The -- the copy -- the fly leaf</p> <p>6 says '21. I'm wondering what month.</p> <p>7 A. It came out in June, and I have</p> <p>8 that data as part of my rebuttal, the</p> <p>9 publication data, so you have it too.</p> <p>10 Q. And when did you start writing the</p> <p>11 book?</p> <p>12 A. God, it's hard to tell because some</p> <p>13 months before it went into production -- I</p> <p>14 want to say December or -- December of 2020,</p> <p>15 maybe.</p> <p>16 Q. Okay. I ask because the first</p> <p>17 paragraph of the Acknowledgment says, "After</p> <p>18 eight months of trying to solicit a</p> <p>19 manuscript about QAnon, and either getting no</p> <p>20 response from journalists covering the Q beat</p> <p>21 (whom I -- Mia -- will not name, but you know</p> <p>22 who you are) or being ghosted by a</p> <p>23 prospective author, Allen joked that at this</p> <p>24 point I probably know enough about QAnon to</p>	<p style="text-align: right;">Page 340</p> <p>1 A. Those cases are still active.</p> <p>2 Q. Well, I mean, if there's a</p> <p>3 protective order, you can designate it as</p> <p>4 confidential, but I'm entitled to know the</p> <p>5 answer to the question.</p> <p>6 A. Okay.</p> <p>7 MR. BISS: Yeah, but that --</p> <p>8 but that -- the problem is there</p> <p>9 might be some order or some</p> <p>10 agreement or something in the other</p> <p>11 cases that she's working on that</p> <p>12 would prohibit it.</p> <p>13 Let me figure out that out,</p> <p>14 find that out, and, then -- and,</p> <p>15 then, I'll identify them for you.</p> <p>16 BY MS. BOLGER:</p> <p>17 Q. Can you tell the topic? You don't</p> <p>18 have to tell me the case.</p> <p>19 A. It's on QAnon belief.</p> <p>20 Q. Okay. Does it involved Mr. Biss?</p> <p>21 A. No.</p> <p>22 Q. Okay. Well, I would like to know</p> <p>23 what those cases are.</p> <p>24 Has a Court ever --</p>
<p style="text-align: right;">Page 339</p> <p>1 write a book" -- itself -- "myself."</p> <p>2 Do -- so I don't know if that</p> <p>3 refreshes your memory about when Mia reached</p> <p>4 out to you to write the book.</p> <p>5 A. It doesn't. It doesn't. I'm</p> <p>6 sorry. I want to say it was mid winter,</p> <p>7 December of 2020, or January or something.</p> <p>8 Q. Okay. In the -- in your expert</p> <p>9 report, in Appendix III, you have an</p> <p>10 application for a grant.</p> <p>11 That's not related to the book,</p> <p>12 right?</p> <p>13 A. It is not. It is a separate thing.</p> <p>14 Q. How did you come to be retained?</p> <p>15 A. Mr. Biss -- Biss reached out to me.</p> <p>16 Q. Okay. Have you ever been an expert</p> <p>17 before?</p> <p>18 A. I have been consulted, but it</p> <p>19 didn't go as far as depositions. So I've</p> <p>20 been consulted as an expert, but...</p> <p>21 Q. And what was that in?</p> <p>22 A. I don't know that I'm allowed to</p> <p>23 say.</p> <p>24 Q. You are.</p>	<p style="text-align: right;">Page 341</p> <p>1 MS. BOLGER: And, actually,</p> <p>2 Steven, I think it's required,</p> <p>3 but...</p> <p>4 THE WITNESS: I'm -- I'm happy</p> <p>5 -- as long as it is preserved as</p> <p>6 confidential, because I -- I did</p> <p>7 have a conversation with the</p> <p>8 attorneys who handle the case, and</p> <p>9 it is clear that I can't disclose</p> <p>10 anything until the case is over and</p> <p>11 maybe even after that. I don't</p> <p>12 know.</p> <p>13 BY MS. BOLGER:</p> <p>14 Q. Okay. Well, I -- I think I'm</p> <p>15 entitled to an answer to the question. I</p> <p>16 don't think Mr. Biss actually disagrees with</p> <p>17 me, so I'll expect an answer to the question</p> <p>18 after the deposition is over, or you can</p> <p>19 answer it now, but I'm going to get it.</p> <p>20 I'm -- I'm entitled to an answer to this</p> <p>21 question.</p> <p>22 MS. BOLGER: So how to you</p> <p>23 want to do it?</p> <p>24 MR. BISS: I think you are</p>

<p style="text-align: right;">Page 342</p> <p>1 entitled to it, but I'm not going 2 to put Mr. Moskalenko in a position 3 of violating some other order or 4 directive or agreement or whatever 5 it is in the other case. 6 I just want to make sure 7 that -- that, you know, we -- we do 8 everything by the book. 9 MS. BOLGER: "Book." 10 I -- I think I'm entitled to 11 it. I -- I will get it. I hope I 12 don't have to compel it, but I'd 13 like the information. 14 MR. BISS: You won't have to 15 compel it, because we'll -- we'll 16 mark this deposition highly 17 confidential, counsel's eyes only. 18 So as soon as I find out that 19 there's no problem in this other 20 case or no issue or restriction, I 21 will write you an email. 22 BY MS. BOLGER: 23 Q. Your hourly rate is 330 an hour, 24 right?</p>	<p style="text-align: right;">Page 344</p> <p>1 A. Yeah. And I didn't have that same 2 amount of background work for the second one. 3 Q. And you've already testified you 4 did them totally on your own, right? 5 A. Correct. 6 Q. Is this rate that you're charging 7 Mr. Biss higher, lower, the same as the other 8 matter? 9 A. It is the same. 10 Q. How much have you charged to date? 11 A. I haven't charged yet. I haven't. 12 Q. You didn't charge for the preparing 13 of the report? 14 A. Not yet. 15 Q. Okay. How -- how many -- 16 A. Mr. Biss told me that it will be 17 done after. 18 MR. BISS: I think there's 19 some -- some miscommunication. 20 You're asking about -- 21 MS. BOLGER: How much money 22 you paid her. 23 MR. BISS: But you're asking 24 about the time for the deposition,</p>
<p style="text-align: right;">Page 343</p> <p>1 A. 350 -- wait. Sorry. No, no, no. 2 I don't know where you got 330 at all. 3 It's 400 for preparing the report. 4 It's 450 for deposition, and if I have to 5 testify at trial, it's 500. I don't know 6 where you got 350 -- 330. That's never 7 featured. 8 Q. I probably made a mistake. 9 A. Okay. That happens. 10 Q. Did you make more money preparing 11 the rebuttal than you did the opening report? 12 A. No, I didn't. 13 Q. Why not. It's longer. 14 A. Why do you think it takes longer? 15 Q. No. It is longer. I didn't say it 16 took longer. 17 A. It is -- 18 Q. It is physically longer. 19 A. Yeah. I counted the amount of time 20 it took me to familiarize myself all the 21 materials. There was a lot. And reading 22 depositions takes a long time. 23 Q. Okay. So that's not the first 24 report.</p>	<p style="text-align: right;">Page 345</p> <p>1 or are you asking about for 2 preparation of the reports? 3 MS. BOLGER: For the 4 preparation of the report. 5 THE WITNESS: Oh, you said how 6 many money I charge today. I 7 thought today. 8 MS. BOLGER: To date. 9 THE WITNESS: Oh, to date. 10 I'm sorry, I'm sorry. 11 MR. BISS: Oh, I thought -- I 12 thought she said -- I thought you 13 said, "today." 14 THE WITNESS: So, I -- let's 15 see, a little less than 17,000. I 16 don't know the exact amount. 17 BY MS. BOLGER: 18 Q. Okay. Does that include the 19 rebuttal? 20 A. It does. 21 Q. Okay. And, now, you're telling me 22 that Mr. Biss has told you that he's not 23 going to pay you any amount of money yet for 24 today? I didn't -- I didn't understand what</p>

<p style="text-align: right;">Page 346</p> <p>1 the colloquy was.</p> <p>2 MR. BISS: No, here's what</p> <p>3 we're going to do for today:</p> <p>4 Because I honored your email and</p> <p>5 the attached case, we're going to</p> <p>6 send you a bill. And, then, if the</p> <p>7 bill isn't paid, then we're going</p> <p>8 to go to Judge Cave, and compel CNN</p> <p>9 to pay it. So we hope that's not</p> <p>10 necessary.</p> <p>11 We're --</p> <p>12 MS. BOLGER: Why -- why --</p> <p>13 MR. BISS: Dr. Moskalkenko is</p> <p>14 going to prepare an invoice of all</p> <p>15 the time to prepare for the</p> <p>16 deposition, all the time for the</p> <p>17 deposition, and whatever travel --</p> <p>18 other travel costs there are.</p> <p>19 MS. BOLGER: We agree with the</p> <p>20 travel costs.</p> <p>21 MR. BISS: Yeah. And, then,</p> <p>22 we're going to -- we're going to</p> <p>23 submit it to you.</p> <p>24 MS. BOLGER: Okay. But I</p>	<p style="text-align: right;">Page 348</p> <p>1 MS. BOLGER: Okay. We would</p> <p>2 call for the production of prior</p> <p>3 drafts of the report.</p> <p>4 Sorry, Steve.</p> <p>5 MR. BISS: No problem.</p> <p>6 Or confirmation there are</p> <p>7 none, correct?</p> <p>8 MS. BOLGER: Yes.</p> <p>9 BY MR. BISS:</p> <p>10 Q. Okay. Dr. Moskalkenko, I want to</p> <p>11 ask you just a couple of follow-up questions,</p> <p>12 and, then, I've got two exhibits I'm going to</p> <p>13 show you.</p> <p>14 A. Mm-humm.</p> <p>15 Q. So you were shown a copy of</p> <p>16 Exhibit-415, which is an arguably two-page</p> <p>17 exhibit, and on the second page you were</p> <p>18 asked about a tweet by somebody or something</p> <p>19 called "MadMerlin," and it has a photograph</p> <p>20 and it's very small.</p> <p>21 A. Yes.</p> <p>22 Q. Very, very.</p> <p>23 But it has a reference in here to</p> <p>24 "Q Sent Me."</p>
<p style="text-align: right;">Page 347</p> <p>1 would just point out for the record</p> <p>2 that that decision by Magistrate</p> <p>3 Judge Cave does not say it should</p> <p>4 be paid now, and it does not say it</p> <p>5 should be paid in full, but we</p> <p>6 don't have to fight about it --</p> <p>7 that now.</p> <p>8 I think that's probably it.</p> <p>9 No further questions.</p> <p>10 - - -</p> <p>11 CROSS-EXAMINATION</p> <p>12 - - -</p> <p>13 BY MR. BISS:</p> <p>14 Q. Okay. Mr. Moskalkenko, I just have</p> <p>15 a cup of follow-up questions, and I want to</p> <p>16 start with Exhibit-415.</p> <p>17 MS. BOLGER: I'm sorry. Can I</p> <p>18 ask one quick question, which I</p> <p>19 should have asked?</p> <p>20 MR. BISS: Yeah, no problem.</p> <p>21 MS. BOLGER: Do you have prior</p> <p>22 drafts of your report?</p> <p>23 THE WITNESS: I'm not sure.</p> <p>24 Maybe. I'm not sure.</p>	<p style="text-align: right;">Page 349</p> <p>1 A. Mm-humm.</p> <p>2 Q. And the -- the photograph that's</p> <p>3 attached is a photograph of General Flynn on</p> <p>4 the left, some gentleman in -- in the middle.</p> <p>5 I don't remember his name, but he was</p> <p>6 identified during Jack Flynn's deposition.</p> <p>7 And, then, Jack Flynn on the right.</p> <p>8 And each -- each of the gentlemen</p> <p>9 is holding or referring to a -- a card or a</p> <p>10 bumper sticker or whatever it is in their</p> <p>11 hands.</p> <p>12 Do you remember Jack Flynn's</p> <p>13 deposition testimony about this particular</p> <p>14 picture?</p> <p>15 A. I do not. I'm sorry to say.</p> <p>16 MS. BOLGER: I object to the</p> <p>17 form of the question.</p> <p>18 BY MR. BISS:</p> <p>19 Q. Do you know -- do you know who or</p> <p>20 where Jack Flynn got the card that he's</p> <p>21 holding in his hand, do you know where</p> <p>22 that -- that came from, or how he came to be</p> <p>23 holding it?</p> <p>24 A. I have some vague recollection, but</p>

<p style="text-align: right;">Page 350</p> <p>1 I would be just misstating, so let's just say 2 I don't remember enough to -- to testify to 3 where he got it. 4 Q. Okay. Fair enough. 5 And earlier in the deposition, you 6 testified about sarcasm being a motivating 7 factor sometimes for what people tweet -- 8 MS. BOLGER: Object to the 9 form. 10 BY MR. BISS: 11 Q. -- and you used Michael Rothschild 12 as an example. 13 A. Yes. 14 Q. And there are probably plenty 15 other -- other examples. 16 In your experience, do people 17 sometimes tweet things as a joke? 18 MS. BOLGER: Object to the 19 form of the question. 20 THE WITNESS: Yes, absolutely. 21 BY MR. BISS: 22 Q. Okay. That -- that certainly 23 wouldn't indicate that they were a QAnon 24 follower or a -- or a follower of anyone</p>	<p style="text-align: right;">Page 352</p> <p>1 (Whereupon, Exhibit P-72, 2 One-Page Document, was marked for 3 identification.) 4 - - - 5 BY MS. BOLGER: 6 Q. Dr. Moskalenko, I hand you a 7 one-page document that I've premarked for 8 identification as P-72. The "P" meaning 9 "Plaintiffs." 10 Have you ever seen this document 11 before today? 12 A. I have not. 13 Q. All right. 14 Earlier in the deposition, you 15 testified that -- you were asked some 16 questions about a QAnon slogan called #Storm. 17 MS. BOLGER: Object to the 18 form. 19 BY MR. BISS: 20 Q. Do you remember that? 21 A. It was mentioned as some of the 22 QAnon hashtags earlier in the deposition, it 23 was. 24 Q. And you were asked about "Great</p>
<p style="text-align: right;">Page 351</p> <p>1 else; is that correct? 2 A. That's correct. 3 Q. All right. 4 I'm going to show you an exhibit. 5 MR. BISS: Can I borrow an 6 exhibit sticker from you? 7 MS. BOLGER: Do you want my 8 numbers, or do you want to write 9 your own in? 10 MR. BISS: I'm going to write 11 my own. I'm going to mark them 12 Plaintiff's Exhibits. 13 MS. BOLGER: How many do you 14 have? 15 MR. BISS: I have two. 16 MS. BOLGER: Okay. 17 MR. BISS: A grand total of 18 two. 19 MS. BOLGER: I'd just -- I'd 20 like at this point to tell you that 21 in my next life I'm going to be an 22 erasable pen salesman, because this 23 is the greatest pen in the world. 24 - - -</p>	<p style="text-align: right;">Page 353</p> <p>1 Awakening" and other terms that -- that CNN 2 says are QAnon slogans? 3 MS. BOLGER: Objection to the 4 form of the question. 5 THE WITNESS: Yes, I was asked 6 about that. 7 BY MR. BISS: 8 Q. Are you aware that in -- this is a 9 tweet from Melania Trump on June 22, 2012, 10 from somewhere -- she says here, "earth." 11 "Somewhere on earth." 12 Are you aware that sometimes people 13 tweet and use hashtags in -- in the literal 14 sense, such as "A storm is on the way"? 15 MS. BOLGER: Object to the 16 form. 17 THE WITNESS: Yes. And, in 18 fact, I -- I said that I sometimes, 19 you know, use "storm" in a little 20 way, as well, even though I don't 21 feel that's similar to Melania 22 Trump. 23 BY MR. BISS: 24 Q. All right.</p>

<p style="text-align: right;">Page 354</p> <p>1 And this particular tweet has what</p> <p>2 appears to be an ominous black sky in the</p> <p>3 background.</p> <p>4 Do you see that?</p> <p>5 A. I do.</p> <p>6 Q. Are you aware that some people</p> <p>7 believe that a black sky, such as this --</p> <p>8 this picture shows, is a beautiful depiction</p> <p>9 of the sky?</p> <p>10 MS. BOLGER: Object to the</p> <p>11 form.</p> <p>12 THE WITNESS: Probably.</p> <p>13 BY MR. BISS:</p> <p>14 Q. All right.</p> <p>15 You can set that to the side.</p> <p>16 A. (Witness complies.)</p> <p>17 Q. I'm going to show you a document</p> <p>18 that I'm going to mark as P-73.</p> <p>19 - - -</p> <p>20 (Whereupon, Exhibit P-73,</p> <p>21 Multi-Page Document, was marked for</p> <p>22 identification.)</p> <p>23 - - -</p> <p>24</p>	<p style="text-align: right;">Page 356</p> <p>1 before today?</p> <p>2 A. I don't think I've seen the</p> <p>3 article. However, these tweets came up with</p> <p>4 when I did the search for "Where We Go One,</p> <p>5 Where We Go One, We Go All" with the hashtag.</p> <p>6 Q. Fair enough. So let's look at the</p> <p>7 last two pages of the exhibit, and these are</p> <p>8 photocopies of a Twitter profile and some</p> <p>9 tweets by Coach McCartney.</p> <p>10 You don't know Coach McCartney, do</p> <p>11 you?</p> <p>12 A. I do not.</p> <p>13 Q. Okay. And her profile says that</p> <p>14 she's a coach, a sister, a friend, a</p> <p>15 long-time learner and a passionate -- and I</p> <p>16 think that is -- is like --</p> <p>17 MR. BISS: No. It's "liver."</p> <p>18 She's a passionate liver of life.</p> <p>19 THE WITNESS: She lives</p> <p>20 passionately.</p> <p>21 MR. BISS: Okay. Fair enough.</p> <p>22 Fair enough.</p> <p>23 BY MR. BISS:</p> <p>24 Q. Okay. So she's a passionate liver.</p>
<p style="text-align: right;">Page 355</p> <p>1 BY MR. BISS:</p> <p>2 Q. This is a multi-page document that</p> <p>3 I put together for purposes of asking you</p> <p>4 some questions today.</p> <p>5 MS. BOLGER: I'm just going to</p> <p>6 object to the idea if it's a</p> <p>7 composite exhibit, but go ahead.</p> <p>8 MR. BISS: Yeah.</p> <p>9 BY MR. BISS:</p> <p>10 Q. So, anyway, the first part of the</p> <p>11 exhibit -- the first four pages of the</p> <p>12 exhibit are an article that appeared in the</p> <p>13 Main Line Media News, and this is an article</p> <p>14 in the Sports section about Villa Maria</p> <p>15 Academy's Kathy McCartney getting her 500th</p> <p>16 win. And the article -- you can read it, but</p> <p>17 the article is about a high school basketball</p> <p>18 coach who earned her 500th win back in</p> <p>19 February of 2023, against -- against Sacred</p> <p>20 Heart School.</p> <p>21 Earlier in the deposition, you</p> <p>22 talked about a basketball coach?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Have you seen this article</p>	<p style="text-align: right;">Page 357</p> <p>1 And she joined Twitter in March of</p> <p>2 2014. She has some number of followers an</p> <p>3 foll- -- and a following. But I want to ask</p> <p>4 you most specifically about the -- about the</p> <p>5 tweets.</p> <p>6 And I just want to direct your</p> <p>7 attention to three of these tweets:</p> <p>8 February 13th, February 3rd, and</p> <p>9 January 28th.</p> <p>10 And do you know -- do -- can you</p> <p>11 see the -- can you see the phrase that she</p> <p>12 uses there?</p> <p>13 A. Yes.</p> <p>14 Q. And -- and one of those phrases is,</p> <p>15 "#Where We Go One, We Go All."</p> <p>16 Do you see that?</p> <p>17 A. I do.</p> <p>18 Q. And there's a hashtag that she's</p> <p>19 put in front of that.</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And are you -- do you know</p> <p>22 what putting a hashtag in front of something</p> <p>23 on -- on Twitter does? Do you know what --</p> <p>24 what the hashtag architecture --</p>


<p style="text-align: right;">Page 358</p> <p>1 MS. BOLGER: Object to form. 2 THE WITNESS: It means it's 3 searchable, I understand, though. 4 BY MR. BISS: 5 Q. Okay. 6 A. Yeah. 7 Q. So, in other words, Coach McCartney 8 wasn't hiding anything from anybody. She 9 wanted that to be searchable. 10 MS. BOLGER: Object to the 11 form. 12 BY MR. BISS: 13 Q. She -- she wanted to counsel for 14 CNN, Ms. Bolger, to find that if she -- if 15 she was searching for it, right? 16 MS. BOLGER: Object to the 17 form of the question. 18 Come on. If you answer that 19 question, that would be outrageous. 20 BY MR. BISS: 21 Q. Okay. So -- so, in other -- in 22 other words, though, she put the hash- -- you 23 see she put the hashtag in front of, "#Where 24 We Go One, We Go All"?</p>	<p style="text-align: right;">Page 360</p> <p>1 form. 2 I do not. 3 THE WITNESS: I do not. 4 BY MS. BOLGER: 5 Q. Do you remember her telling you who 6 her favorite baseball team was -- 7 A. No. 8 MS. BOLGER: No. 9 BY MR. BISS: 10 Q. And she said, the Yankees was her 11 favorite team, remember? 12 A. We were not in the same -- 13 MS. BOLGER: We were not in 14 the same -- that did not happen. 15 We talked about it off the 16 record. 17 MR. BISS: Oh, okay. 18 BY MR. BISS: 19 Q. All right. 20 So you weren't here. You didn't 21 her -- hear Ms. Bolger say the Yankees were 22 her favorite team? 23 A. I did not, and I -- and I wasn't 24 here and I didn't hear it.</p>
<p style="text-align: right;">Page 359</p> <p>1 A. I do. 2 Q. And she also put "#RollCanes." 3 Do you know why she said, 4 "#RollCanes"? 5 MS. BOLGER: Object. 6 THE WITNESS: I don't know 7 what that means. 8 BY MR. BISS: 9 Q. Okay. Is there anything about 10 these tweets that would suggest to you that 11 Coach McCartney is a QAnon follower? 12 A. No, there isn't. 13 Q. Okay. You can put that to the 14 side. 15 A. (Witness complies.) 16 Q. Earlier in the deposition, 17 Ms. Bolger engaged in some chitchat about 18 baseball; do you remember that? 19 A. Baseball? 20 MS. BOLGER: Object -- 21 BY MR. BISS: 22 Q. Yeah. Do you remember her telling 23 you -- 24 MS. BOLGER: Object to the</p>	<p style="text-align: right;">Page 361</p> <p>1 Q. Fair enough. Did you hear -- were 2 you here, and did you hear Ms. Bolger say 3 that her husband's favorite baseball team is 4 the Baltimore Orioles? 5 A. Absolutely not. 6 Q. Okay. Do you have a favorite 7 baseball team? 8 A. Do not. 9 Q. Okay. I don't either. I'm -- I'm 10 Canadian. I don't watch baseball. 11 Would you agree, though, that -- 12 and -- and you're familiar there's -- there's 13 sporting good stores around the nation, 14 including publicly traded companies, like 15 DICK'S Sporting Goods. 16 A. Can you please go easy on the -- on 17 the sports? 18 Q. No, I understand. I understand. 19 But you are aware -- you've heard 20 of DICK'S Sporting Goods? 21 A. Yes, I have. 22 Q. And you're aware that in sporting 23 goods stores they sell things like Yankees 24 uniforms and some other sporting goods?</p>

<p style="text-align: right;">Page 362</p> <p>1 A. Yes.</p> <p>2 MS. BOLGER: Object to the</p> <p>3 form.</p> <p>4 BY MR. BISS:</p> <p>5 Q. Okay. And are you aware that there</p> <p>6 are DICK'S Sporting Goods located in just</p> <p>7 about every state, including the southern</p> <p>8 states of Florida and Alabama and those</p> <p>9 southern states?</p> <p>10 A. I was not aware of that.</p> <p>11 Q. Okay. Do you believe that just</p> <p>12 because a sporting goods store sells Yankees</p> <p>13 clothing, Yankees hats, shirts, that type of</p> <p>14 thing, what I would call "Yankees merch," do</p> <p>15 you believe that that -- that automatically</p> <p>16 makes them Yankees followers?</p> <p>17 MS. BOLGER: Object to the</p> <p>18 form. And, also, I don't get it.</p> <p>19 Go ahead.</p> <p>20 THE WITNESS: I do not believe</p> <p>21 that to be the fact.</p> <p>22 MR. BISS: No other questions.</p> <p>23 Thank you.</p> <p>24 MS. BOLGER: I -- just two</p>	<p style="text-align: right;">Page 364</p> <p>1 sporting goods sales, right?</p> <p>2 A. Very much not.</p> <p>3 Q. Okay.</p> <p>4 MS. BOLGER: I have no further</p> <p>5 questions.</p> <p>6 - - -</p> <p>7 RECROSS-EXAMINATION</p> <p>8 - - -</p> <p>9 BY MR. BISS:</p> <p>10 Q. Looking at -- one follow-up.</p> <p>11 Looking a Coach McCartney's tweets</p> <p>12 and the profile that -- that she wrote of</p> <p>13 herself, do you think there's any chance that</p> <p>14 she's a QAnon follower?</p> <p>15 A. Not from those data, no.</p> <p>16 Q. All right.</p> <p>17 Is there any data in the Twitter</p> <p>18 profile of Coach McCartney that would</p> <p>19 indicate or support the view that she's a</p> <p>20 QAnon follower?</p> <p>21 A. No, there isn't.</p> <p>22 Q. Okay.</p> <p>23 MR. BISS: No other questions.</p> <p>24 MS. BOLGER: I'm going to</p>
<p style="text-align: right;">Page 363</p> <p>1 questions.</p> <p>2 - - -</p> <p>3 REDIRECT EXAMINATION</p> <p>4 - - -</p> <p>5 BY MS. BOLGER:</p> <p>6 Q. Do you have any actual information</p> <p>7 about what Kathy McCartney's intent was in</p> <p>8 tweeting out what she tweeted out on Twitter?</p> <p>9 A. I do not.</p> <p>10 Q. Okay. So just as you think someone</p> <p>11 could misunderstand what Jack Flynn said on</p> <p>12 Twitter, someone could have misunderstand</p> <p>13 what Kathy McCartney said on Twitter, right?</p> <p>14 A. Just as I said, Jack Flynn could</p> <p>15 have used the term, "Where We Go One, We Go</p> <p>16 All" to denote unity.</p> <p>17 So, two, I think Ms. McCarthy can</p> <p>18 be using it to denote exactly that.</p> <p>19 Q. Or she could be saying she's a</p> <p>20 QAnon follower. We don't know.</p> <p>21 We don't know anything about her,</p> <p>22 right?</p> <p>23 A. I guess, that's true.</p> <p>24 Q. And you're not an expert on</p>	<p style="text-align: right;">Page 365</p> <p>1 follow up on that.</p> <p>2 - - -</p> <p>3 REDIRECT EXAMINATION</p> <p>4 - - -</p> <p>5 BY MS. BOLGER:</p> <p>6 Q. Because your inquiry was fact-based</p> <p>7 based on information provided to you directly</p> <p>8 by the plaintiff, and no other person would</p> <p>9 have reached the same conclusions you've</p> <p>10 reached, right?</p> <p>11 A. I don't know that to be the fact.</p> <p>12 Why -- why would no other person reach the</p> <p>13 same --</p> <p>14 Q. Well, whatever -- that was badly</p> <p>15 asked. I'm getting tired. I apologize.</p> <p>16 You base your conclusions about the</p> <p>17 Flynn's intent based on the documents they</p> <p>18 provided to, yo, your review of them, and I</p> <p>19 think you agreed with me that when I --</p> <p>20 before the break, that it's possible that</p> <p>21 someone could reach the same -- look at the</p> <p>22 same data, and reach a different conclusion?</p> <p>23 A. It is possible that somebody could</p> <p>24 do that.</p>

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1 Q. Okay.
2 A. And, in fact, Matt -- Mike
3 Rothschild seems to have done just that.
4 Q. Right.
5 MS. BOLGER: Okay.
6 No further questions.
7 MR. BISS: She'll read.
8 MS. BOLGER: Okay.
9 THE VIDEOGRAPHER: The time is
10 4:39. We are going off the video
11 record. This ends Media Unit
12 Number 5, and the video-recorded
13 deposition of Dr. Sophia
14 Moskalkenko.
15 - - -
16 (Whereupon, the witness was
17 excused at this time.)
18 - - -
19 (Whereupon, the deposition
20 concluded at 4:39 p.m.)
21 - - -
22
23
24

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1 - - -
2 C-E-R-T-I-F-I-C-A-T-I-O-N
3 - - -
4 I hereby certify that the
5 witness was duly sworn in for this
6 deposition matter by the Court
7 Reporter.
8
9 
10 _____
11 Mary Hammond
12 June 23, 2023
13 (The foregoing certification
14 of this transcript does not apply
15 to any reproduction of the same by
16 any means, unless under the direct
17 control and/or supervision of the
18 Registered Professional Reporter.)
19
20
21
22
23
24

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Article 31 Disclosure, Section 3116

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